



CITY OF EAST CHICAGO

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July 7, 2020

U.S Environmental Protection Agency, Region 5
Water Enforcement and Compliance Assurance Branch (WC-15J)
Attn: Newton Ellens
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Status Report-Administrative Consent Order (ACO) under Sections 308(a) and 309(a) of the Clean Water Act, 33 U.S.C. § 1318(a) and § 1319(a)

Dear Mr. Ellens:

The East Chicago Sanitary District (the District) submits this letter and attachments in accordance with the requirement per paragraph 50 of the Compliance Requirements of the Administrative Consent Order (ACO), as defined under Sections 308(a) and 309(a) of the Clean Water Act, 33 U.S.C. § 1318(a) and § 1319(a), revised and dated November 14, 2014 to address the items identified on your letter of June 5, 2020.

USEPA Comment:

1. **Paragraph 47:** Within 120 days of the date of this Order, ECSD shall determine the additional resources (including staffing and funding) it needs to operate its pretreatment program consistent with 40 C.F.R. § 403.8(f)(3). ECSD proposed five measures to free up or add additional resources to run the pretreatment program. However, ECSD only followed through with two of those five measures. ECSD has not described to EPA how implementing only two of the five measures proposed has impacted its efforts to build sufficient pretreatment resources:

- a. In 2016, ECSD proposed shifting more Industrial User (IU) monitoring responsibilities to the IUs, in order to free ECSD staff to work on other pretreatment duties. The IUs pushed back, so ECSD dropped this proposal.
- b. A compliance manager position was created in 2016. The compliance manager has direct management responsibility and direct oversight of pretreatment staff and ensures proper enforcement of the program. ECSD has implemented this proposal.
- c. ECSD proposed a pretreatment administrator position. The person in this position would process routine IU compliance documentation and correspondence. However, the majority of these tasks are already addressed by the Pretreatment Coordinator (Nickie Geros). So ECSD dropped this proposal. Instead, ECSD re-assigned administrative staff to help Ms. Geros with these tasks. Also, ECSD uses new procedures and methods to monitor the progress of pretreatment processing activities.

Please advise whether ECSD has concluded that this arrangement is working or falling to meet ECSD's needs.

- d. ECSD created a pretreatment assistant position to assist the pretreatment inspector during site visits. The person in this position (Henry Padilla) is also responsible for sampling pump stations and sewer collection system locations. Mr. Padilla conducts sampling, data review, and data entry into the HACH database. Please advise whether requiring one person to perform all of these functions is working.
- e. ECSD is trying to hire another Pretreatment Coordinator. ECSD, however, has not followed through on this goal. Please provide the timeframe within which ECSD intends to fill this position.

ECSD Response:

Although the IUs declined to take on the responsibility to perform self-monitoring, the pretreatment monitoring performed by the District has been consistent, demonstrating that the monthly sampling, or more frequent sampling when necessary, can be completed by the current staff. The Compliance Manager position was filled and has increased the effectiveness of the pretreatment program given the limited resources available. Assignment of office administrative staff has proven useful in maintenance and filing of documentation and correspondence related to the pretreatment activities including the collection of penalties associated with enforcement actions. Establishment of a system to track our analytical results and the timely uploading of the results into our HACH software database by our Pretreatment Assistant has dramatically increased the identification of violations and the timely issuance of Notices of Violations (NOVs) and associated penalties. The Pretreatment Assistant has also been assigned the added responsibility to assist the Pretreatment Coordinator with the performance of with conducting annual site inspections. This has been proven effective as the Pretreatment Coordinator was unable to perform many of the inspections due to a personal injury sustained last year that limited her physical ability to conduct the inspections in person. We are of the opinion that the sharing of responsibilities between the Pretreatment Coordinator and Pretreatment Assistant is able meet most of the needs of the Pretreatment program. To address our shortfalls, both in available manpower and technical resources, the District proposed to hire another Pretreatment Coordinator. To date, the District has not been able to identify a suitable candidate for the position. In the interim going forward, the District will be contracting with our engineering consultant (Butler, Fairman & Seifert (BF&S)) to enable us to address the areas where additional resources are needed. As an example, BF&S will be tasked to assist with the development and evaluation of the non-uniform allocation of the cyanide, either through mass-based allocation or flow-based allocation, for adoption by the Sanitary Board and approval by IDEM and USEPA.

USEPA Comment:

2. Paragraph 41: ECSD is required to complete the review, correction, and re-issuance of all Industrial User (IU) permits. ECSD made this commitment in December 2014 in the ACO. Under 40 C.F.R. §§ 403.8(f)(1)(iii)(B) and 403.8(f)(2)(iii), ECSD must notify significant IUs of applicable pretreatment standards and requirements. Almost six years after signing the ACO, ECSD continues to fail to implement pretreatment standards in its IU permits:

- a. The National Processing and Safety-Kleen IU permits continue to have the incorrect analytical method for molybdenum (EPA Method 245.1).
- b. The National Processing IU permit continues to have the wrong limits. The limits are incorrect because:

- i. The limits are based on the wrong categorization. According to the January 28, 2013 EPA inspection report, the National Processing facility (Outfall #514) uses hydrochloric acid to pickle carbonic steel coils. However, the limits in the National Processing Facility appear to be consistent with daily effluent limits for facilities using sulfuric acid.
 - ii. The permit omits 30-day limits.
- c. The Safety-Kleen permit continues to have the wrong limits. The limits are incorrect because:
- i. The permit includes limits under Part 442 (Transportation Equipment Cleaning). Safety-Kleen is a Centralized Waste Treatment facility (under Part 437). In a February 20, 2020 letter, we questioned whether the Safety-Kleen permit should include limits under Part 442, because the process description section of the Safety-Kleen permit does not indicate that Safety-Kleen conducts this type of activity. However, we learned (according to Safety-Kleen's IU permit and a 2016 EPA inspection) that Safety-Kleen is permitted to clean the interior of railcars. Still, 40 C.F.R. § 437.1(b)(10) states that onsite wastewater generated in cleaning equipment along with other off-site wastes (subject to Part 437) not generated in cleaning transportation equipment is subject to Part 437. If this is the case for the Safety-Kleen facility, then the permit should only include Part 437 limits (not Part 442 limits). ECSD must issue limits based upon the correct process description.
 - ii. The permit does not include monthly categorical limits under Part 437.

ECSD Response:

The District has corrected the permits for National Processing (#514) and Safety Kleen Systems (#901) as noted. In both permits, the analytical method for Molybdenum was changed from EPA Method 245.1 (applicable for Mercury only) to Method 200.7/200.8. The National Processing categorical limits for hydrochloric acid pickling rather than sulfuric acid pickling were amended. Additionally, the monthly limits that were missing were also added. It should be noted that the corrected limits for hydrochloric acid pickling operations are less stringent than the sulfuric acid limits that had been erroneously adopted. With regard to the Safety Kleen permit, the 40 CFR Part 442 categorical limits for cleaning of transportation equipment were removed as that operation is included under the 40 CFR Part 437 categorical limits for Centralized Waste Treatment facilities. The monthly categorical limits were also added to the amended permit. Copies of the amended permits for National Processing and Safety Kleen are provided as attachments to this letter.

USEPA Comment:

3. **Paragraph 44:** ECSD shall create and begin implementation of a plan to conduct annual SIU inspections, as required by 40 C.F.R. § 403.8(f)(2)(v).
 - a. ECSD stated that it would send final inspection reports by 4/1/2020. However, EPA has not received these reports and ECSD has not asked EPA for an extension in which to file these reports.

- b. In 2019 ECSD issued 21 IU permits. Presumably, ECSD should have issued an inspection report for each IU with a permit. ECSD only sent five inspection checklists for 2019:
1. Material Science;
 2. W.R. Grace;
 3. Lakeshore Railcar;
 4. Safety-Kleen; and
 5. Praxair.
- c. Some of the inspection checklists did not include the elements required in Paragraph 44 (description of the process and waste storage tanks, description of the pretreatment process, and average and maximum discharge rates).

ECSD Response:

Attached to this letter are the inspection reports for the following:

GATX Groundwater remediation	Outfall #112
Electric Coatings	Outfall #312
W R Grace	Outfall #401
National Processing	Outfall #514
ICO Polymers	Outfall #518
Lakeshore Railcar Services	Outfall #521
Praxair	Outfall #531
Praxair	Outfall #541
Safety Kleen Systems	Outfall #901
US Steel	Outfall #936
Praxair	Outfall #941
US Gypsum	Outfall #951

The inspection reports for Green Lake Tube (#511) and each of the Arcelor Mittal Steel facilities (#611, #804, #805, #931, #934 and #935) have not been completed. The District intends for the Pretreatment Coordinator to prioritize completing these inspections as soon as possible. If necessary, the District will direct BF&S to assist in completing these inspections. The District has been reviewing the historical information with regard to the process descriptions and storage tank sizes and attempting to verify that information with what was observed during the site inspection. The District is preparing a summary list of the descriptions of the process and waste storage tanks, descriptions of the pretreatment processes, and average and maximum discharge rates for each IU and will forward it to USEPA once completed. These details will be added to each inspection report. Again, the District may enlist the help of BF&S to complete this task.

USEPA Comment:

4. Paragraph 48: ECSD shall carry out enforcement actions in accordance with its ERP. When ECSD identifies recurring violations, it must escalate its enforcement response.

- a. The main issue here is with Safety-Kleen. For 2019, a total of \$80,500 in fines was issued by ECSD and only \$28,500 of that total has been paid. The majority of the remaining balance, totaling \$47,500, consists of the CN violations that have been contested by Safety-Kleen Systems. The payment of the outstanding CN related fines

will be part of a negotiated settlement as part of our ongoing litigation with Safety-Kleen Systems.

- b. ECSD stated that a negotiated settlement with Safety-Kleen would involve issuing a revised local limit to the company. As part of this, ECSD stated that it would consider changing its uniform cyanide local limit allocation to a non-uniform allocation. However, ECSD has not recently contacted EPA's permitting section about proposing this change even though ECSD and this enforcement branch of EPA discussed the need for ECSD to contact EPA's permitting section during our last teleconference in the winter of 2020.

ECSD Response:

As noted in our previous response, the District is enlisting the services of BF&S to develop and evaluate non-uniform allocation of cyanide discharge limits, either through mass-based allocation or flow-based allocation, for adoption by the Sanitary Board and approval by IDEM and USEPA. The District wants to evaluate both possible non-uniform cyanide discharge limit scenarios and determine which method is better at addressing our need to meet our IUs need for higher discharge limits and the District's ability to maintain compliance with its NPDES cyanide discharge requirements. The District will be discussing the scope of this work with BF&S and will provide USEPA with a proposed schedule for the completion of development of the alternate limits. The development and adoption of the alternate cyanide discharge limit is a key component of the pending negotiated settlement with Safety Kleen. Once the alternate cyanide discharge limit is adopted, the District and Safety Kleen will be in a position to finalize the negotiated settlement and collection of past fines incurred.

USEPA Comment:

5. **Paragraph 50:** ECSD shall submit a written report to EPA on the status of the completion of each item identified in the Order on a quarterly basis (January-March, April-June, July-September, and October-December), until informed in writing by EPA that Respondent may cease sending such written reports. Reports will be due on the last day of the month following the last month of each calendar quarter. The latest status report is dated March 4, 2020. It was due at the end of January. ECSD did not submit a report for the January-March period, which was due on April 30, 2020, nor did ECSD ask EPA for an extension of time in which to submit the report.

ECSD Response:

The District was of the understanding that the ACO status report issued on March 4, 2020 addressing the ACO comments from the USEPA as well as the non-compliance report for the January – March 2020 period issued on April 22, 2020 were what was agreed upon during our last conference call. The District will provide a separate quarterly non-compliance report as well as a separate quarterly ACO status report going forward.

Any questions concerning this report can be directed to me via telephone at (219) 392-8466 or email at azehraoui@eastchicago.com.

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision to assure that qualified personnel properly gathered and evaluated the information

submitted. Based upon my inquiry of the persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information, including the possibility of fines and imprisonment for knowing violations.

Respectfully Submitted,



Abderrahman Zehraoui, Ph.D.
Director of Utilities, City of East Chicago

CC: Joseph Allegretti City Counsel and ECSD Legal Counsel
Steven Kaiser – USEPA Region 5, Associate Regional Counsel
Molly Smith – USEPA
Natalie Maupin – Indiana Department of Environmental Management

Attachment 1 – Revised Permits (#514 and #901)
Attachment 2 – IU Inspection Reports

ATTACHMENT 1
REVISED PERMITS FOR #514 AND #901



EAST CHICAGO SANITARY DISTRICT
EAST CHICAGO, INDIANA
INDUSTRIAL WASTEWATER DISCHARGE PERMIT
OUTFALL NO. 514

Issued to

NATIONAL PROCESSING COMPANY
4506 West Cline Avenue
East Chicago, IN

Effective Date: July 7, 2020

Expiration Date: August 8, 2021

Abderrahman Zehraoui, Ph.D.
Director of Utilities
Issued July 7, 2020

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EAST CHICAGO SANITARY DISTRICT
EAST CHICAGO, INDIANA
INDUSTRIAL WASTEWATER DISCHARGE PERMIT
OUTFALL NO. 514

Issued to

NATIONAL PROCESSING COMPANY

In compliance with Article 13.13.5.01 of the East Chicago Wastewater Ordinance No. 18-0017 (hereinafter "Ordinance"), the East Chicago Sanitary District (hereinafter "District"), by the issuance of this permit, authorizes:

National Processing Company
4506 West Cline Avenue
East Chicago, IN 46312

(hereinafter "permittee") to discharge from the above-identified facility the following, and only the following, specific wastewater streams:

- i) Sanitary wastewater
- ii) Rinse water from steel descaling operations, treated through wastewater treatment facility (Iron and Steel Manufacturing Point Source Category Subpart I & Acid Pickling Category 40 CFR part 420.90)
- iii) Boiler blowdown cooling water

This permit sets forth the standards required of the permittee by the District to ensure compliance with the limitations and conditions of the Ordinance and, where applicable, standards established by the State or Federal authorities.

In compliance with Article 13.13.5.03.4(b) of the Ordinance, the District designates both this permit and the permittee's discharge and sampling location by the **identification number 514**.

The monitoring facility is located outside of the shipping office building, which is the southwest manhole and east of the monitoring manhole for the adjacent facility, outfall 511

By the issuance of this permit, the District acknowledges that the permittee has complied with the application requirements set forth in Article 13.13.5.03.2 of the Ordinance.

By the issuance of this permit, the District acknowledges that the permittee has paid the assessed permit application fee as provided in Article 13.13.4.03 of the Ordinance.

Subject to the following paragraph, and unless otherwise specified, these requirements shall take effect upon issuance of this permit and shall remain in effect until the expiration date of this permit or until the permit is modified in accordance with Article 13.13.5.03.3 of the Ordinance. In accordance with Article 13.13.5.03.6 of the Ordinance, both this permit and the authorization to discharge will expire five (5) years from the date of issuance.

PROCESS DESCRIPTION

National Processing Corporation operates under the Categorical Pretreatment Standard for Iron and Steel Manufacturing Point Source Category Subpart I & Acid Pickling Category (40 CFR part 420.90).

National Processing Corporation operations include pickling, coating, slitting, and cut to length processing of carbon steel coils. The operations are conducted in two separate buildings identified as Plant ii and Plant III. Plant III contains the pickle plant where the steel coils are unrolled, processed through a hydrochloric acid descaling tank system, coated with rust preventive oil, and recoiled. Plant II contains the steel slitting and cut to length lines. General offices are also located in the Plant II building. Both buildings discharge to outfall 514. National Processing produces approximately 1200 tons of pickled steel annually.

EFFLUENT LIMITATIONS

A. CATEGORICAL LIMITATIONS

The permittee shall at no time discharge wastewater containing pollutants in excess of any of the following National Categorical Pretreatment Standards as established by Acid Pickling Category (40 CFR part 420.90).

CATEGORICAL LIMITATIONS 40 CFR Part 420.90^[1]

PARAMETER	DAILY MAXIMUM LIMIT (kg/kg)
Metal Parameters	
Lead	0.000920 kg/1,000 lbs of product
Zinc	0.00123 kg/1,000 lbs of product
MONTHLY AVERAGE LIMIT (kg/kg)	
Lead	0.000307 kg/1000 lbs of product
Zinc	0.000409 kg/1000 lbs of product

This specific list of contaminants shall not relieve the permittee of its responsibility to comply with all other specific pollutants as listed in the Ordinance 13.13.3.02.3. The district requires complete compliance with the Sewer User Ordinance and compliance with all local limitations

B. LOCAL LIMITATIONS

The permittee shall at no time discharge wastewater containing pollutants in excess of any of the following specific pollutant limitations (Local Limits) as established by Article 13.13.3.02.3 of the Ordinance:

Specific Pollutant Limitations

<u>Parameter^[1]</u>	<u>Daily Maximum (mg/L)</u>
Arsenic	1.31
Chromium	7.0
Copper	0.88
Available Cyanide	0.019
Lead	2.28
Mercury	0.0002
Molybdenum	2.8
Nickel	0.80
Zinc	5.5
Fluoride	30

^[1] For any parameter that is covered by multiple pretreatment or local standards, the most stringent shall apply.

Phenols	0.96
Oil & Grease	117
Bis(2-ethylhexyl) Phthalate	1.03
Ammonia	134
Phosphorus	31
pH	5-10 s.u.

Notes:

- 1 For any parameter that is covered by multiple pretreatment standards (i.e. Categorical Standards) the more stringent standard will apply.

C. EXCESS STRENGTH CHARGE LIMITATIONS

The Permittee shall be charged per pound in excess of any of the following excess strength charge limitations in accordance with rates established in Ordinance 15-0023.

Excess Strength Charge Limitations

<u>Parameter</u>	<u>Daily Maximum</u>
Chemical Oxygen Demand	250 mg/L
Total Suspended Solids	100 mg/L

D. GENERAL DISCHARGE PROHIBITIONS

Per Article 13.13.3.01.1 of the Ordinance the permittee must not discharge, directly or indirectly, any of the following described substances into the wastewater disposal system or otherwise to the facilities of the District:

1. Any pollutant which by reason of its nature or quantity is, or may be, sufficient either alone or by interaction to cause fire or explosion or be injurious in any way to the operation of the POTW. This prohibition shall include any wastestream with a closed cup flashpoint of less than 60 degrees Celsius (140 degrees Fahrenheit) using the test methods specified in 40 CFR 261.21, and any wastestream capable of causing an exceedance of ten (10 percent of the Lower Explosive Limit for flammable/explosive gases at any point within the POTW.
2. Any wastewater having a pH less than 5.0 or higher than 10.0 in any grab sample, or having any other corrosive property capable of causing damage or hazard to structures, equipment, or personnel of the system.
3. Any substance which may cause the POTW's effluent or treatment residues, sludges, or scums to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged to the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines, or regulations developed under Section 405 of the Act; any criteria, guidelines, or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act, or State standards applicable to the sludge management method being used.
4. Trucked or hauled pollutants, except at discharge points designated by the District in accordance with §13.13.3.01.2 of this Chapter.

5. Any substance with objectionable color not removed in the treatment process, such as, but not limited to dye wastes and vegetable tanning solutions.
6. Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in Interference; but in no case, wastewater with a temperature at the introduction into the POTW which exceeds 40 degrees Celsius (104 degrees Fahrenheit).
7. Any slug load, which shall mean any pollutant, including oxygen demanding pollutants (BOD, COD, etc.), released in a discharge at a flow rate and/or pollutant concentration which will cause Interference to the POTW.
8. Petroleum, oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause Interference or pass through.
9. Any unpolluted water including, but not limited to, non-contact cooling water, unless otherwise authorized by the District.
10. Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the District in compliance with applicable State or Federal regulation.
11. Solid or viscous substances in amounts which will or may cause obstruction of the flow in the POTW or to the flow in a sewer resulting in interference with the operation of the POTW.
12. Any noxious or malodorous liquids, gases (including smoke, vapors, and fumes), or solids which either singly or by interaction are capable of creating a public nuisance or hazard to life or are sufficient to prevent entry into any part of the POTW for its maintenance and repair.
13. Any wastewater which causes a hazard to human life or creates a public nuisance.
14. Pollutants, substances, or wastewater prohibited by this Section shall not be processed or stored in such manner that they could be discharged to the POTW.

E. TRUCKED OR HAULED WASTE PROHIBITIONS

Per Article 13.13.3.01.2 the permittee must not discharge into the POTW collection system any wastewater or industrial waste which has been trucked, hauled or otherwise removed from its source prior to discharge, unless formal approval for such discharge has been granted by the District.

MONITORING REQUIREMENTS

A. SAMPLING PROCEDURES

All samples must be collected, preserved, and analyzed in accordance with the procedures established in 40 CFR Part 136, and amendments.

B. DISTRICT MONITORING RESPONSIBILITIES

40 CFR 403.12(g)(1) allows the POTW to sample in lieu of the IU. For the effective period of the permit, the District will monitor outfall 514 at the following frequency for the following parameters with the indicated methods, or another approved method found in 40 CFR Part 136 that has an Minimum Detection Limit (MDL) lower than the daily maximum effluent limitation:

Sample Parameter (units)	Measurement Location	Frequency	Method	Sample Type
COD (mg/L)	514	≤1/ month	EPA 410.4	24-hr composite ¹
TSS (mg/L)	514	≤1/ month	SM 2540 D	24-hr composite
Arsenic (mg/L) ²	514	≤1/ month	EPA 200.7	24-hr composite
Chromium (mg/L) ²	514	≤1/ month	EPA 200.7	24-hr composite
Copper (mg/L) ²	514	≤1/ month	EPA 200.7	24-hr composite
Cyanide, Available (mg/L) ³	514	≤1/ month	EPA OIA-1677	grab
Lead (mg/L) ²	514	≤1/ month	EPA 200.7	24-hr composite
Mercury (mg/L) ²	514	≤1 month	EPA 245.1	24-hr composite
Molybdenum (mg/L) ²	514	≤1/ month	EPA 200.71	24-hr composite
Nickel (mg/L) ²	514	≤1/ month	EPA 200.7	24-hr composite
Zinc (mg/L) ²	514	≤1/ month	EPA 200.7	24-hr composite
Bis(2-ethylhexyl) phthalate (mg/L)	514	≤1/ month	EPA 625	24-hr composite
Oil & Grease (HEM) (mg/L)	514	≤1/ month	EPA 1664B	grab
Fluoride (mg/L)	514	≤1/ month	SM 4500-F C	24-hr composite
Phenols (mg/L)	514	≤1/ month	EPA 420.1	24-hr composite
COD	514	≤1/ month	SM 5220 B	24-hr composite
Ammonia (mg/L)	514	≤1/ month	SM 4500-NH ₃ F	24-hr composite
Phosphorous (mg/L)	514	≤1/ month	SM 4500-P B	24-hr composite
pH (s.u.)	514	≤1/ month	EPA 150.2	grab
Temperature	514	≤1/ month	---	grab

C. PERMITTEE MONITORING RESPONSIBILITIES

For the effective period of the permit, the Permittee will monitor outfall 514 at the following frequency for the following parameters:

Sample Parameter (units)	Measurement Location	Frequency	Method	Sample Type
COD (mg/L)	514	≤1/ 6 months	EPA 410.4	24-hr composite ¹
TSS (mg/L)	514	≤1/ 6 months	SM 2540 D	24-hr composite
Arsenic (mg/L) ²	514	≤1/ 6 months	EPA 200.7	24-hr composite
Chromium (mg/L) ²	514	≤1/ 6 months	EPA 200.7	24-hr composite
Cobalt (mg/L) ²	514	≤1/ 6 months	EPA 200.7	24-hr composite
Copper (mg/L) ²	514	≤1/ 6 months	EPA 200.7	24-hr composite
Cyanide, Available (mg/L) ³	514	≤1/ 6 months	EPA OIA-1677	grab
Lead (mg/L) ²	514	≤1/ 6 months	EPA 200.7	24-hr composite
Mercury (mg/L) ²	514	≤1/ 6 months	EPA 245.1	24-hr composite
Molybdenum (mg/L) ²	514	≤1/ 6 months	EPA 200.7	24-hr composite
Nickel (mg/L) ²	514	≤1/ 6 months	EPA 200.7	24-hr composite
Zinc (mg/L) ²	514	≤1/ 6 months	EPA 200.7	24-hr composite

¹ All composite samples shall be time proportional samples

Bis(2-ethylhexyl) phthalate (mg/L)	514	≤1/ 6 months	EPA 625	24-hr composite
Oil & Grease (HEM) (mg/L)	514	≤1/ 6 months	EPA 1664B	grab
Fluoride (mg/L)	514	≤1/ 6 months	SM 4500-F C	24-hr composite
Phenols (mg/L)	514	≤1/ 6 months	EPA 420.1	24-hr composite
COD	514	≤1/ 6 months	SM 5220 B	24-hr composite
Ammonia (mg/L)	514	≤1/ 6 months	SM 4500-NH ₃ F	24-hr composite
Phosphorous (mg/L)	514	≤1/ 6 months	SM 4500-P B	24-hr composite
pH (s.u.)	514	≤1/ 6 months	EPA 150.2	grab
Temperature	514	≤1/ 6 months	---	grab

For the effective period of the permit, the User will also monitor outfall 514 at the following frequency for the discharge flow volume.

Sample Parameter (units)	Measurement Location	Frequency	Sample Type
Flow	514	≤1/ month	Continuous

D. MONITORING FACILITY REQUIREMENTS

Per Article 13.13.5.05(f) of the Ordinance each Discharger must provide and operate at the Discharger's own expense, a monitoring facility to allow inspection, sampling, and flow measurement of each sewer discharge to the District. Each monitoring facility must be situated on the Discharger's premises, except where such a location would be impractical or cause undue hardship on the Discharger. The District may concur with the facility being constructed in the public street or sidewalk area providing that the facility is located so that it will not be obstructed by landscaping or parked vehicles. There must be ample room in or near said sampling facility to allow accurate sampling and preparation of samples for analysis. The facility, sampling, and measuring equipment must be maintained at all times in a safe and proper operating condition at the expense of the Discharger. All monitoring facilities must be constructed and maintained in accordance with all applicable local construction standards and specifications. Construction must be completed within 120 days of receipt of the permit by the discharger.

REPORTING REQUIREMENTS

A. DISCHARGE VOLUME REPORTS

The permittee must report the total monthly flow in gallons from outfall 514 each month. Reports are due on or before the **10th of each month**. If the due date falls on a Saturday, Sunday or a legal holiday, then the due date is the next business day.

B. CALIBRATION REPORT

Pursuant to Article 13.13.5.05 (f) of the Ordinance, the permittee shall submit to the District written notification that calibration and maintenance have been performed on each flow-measuring device employed by the permittee no less than one time per year. The permittee shall submit to the District by April 10th of each year a report verifying calibration and maintenance of said measuring and recording equipment.

C. SELF-MONITORING REPORTS

All self-monitoring data shall be reported to the District in an agreed upon Electronic Data Deliverable (EDD) format. The permittee is required to submit to the District all data obtained

through any self-monitoring of a discharge conducted in accordance with Title 40 CFR part 136. This data must be submitted within thirty (30) days of sampling.

Reports for parameters with a once per month (1/month) monitoring frequency must be submitted within 10 days after each calendar month.

Reports for parameters with a once per quarter (1/quarter) monitoring frequency must be submitted within 10 days after each reporting period. The reporting periods are January-March, April-June, July-September, and October-December. The first quarterly report is due no later than April 10th, 2019.

Reports for parameters with a once per six months (1/6 months) frequency must be submitted within 10 days after each reporting period. The reporting periods are January-June, and July-December. The first 1/6 month report is due July 10th, 2019.

All monitoring reports must indicate the nature and concentration of all pollutants in the effluent for which sampling and analysis were performed during the reporting period preceding the submission of each report, including measured maximum and average daily flows.

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by the U.S. Environmental Protection Agency (EPA) or as specified in this permit, the results of such monitoring must be included in any calculations of actual daily maximum or monthly average pollutant discharge, and results must be reported in the monthly report submitted to the District.

NOTIFICATION REQUIREMENTS

A. ACCIDENTAL DISCHARGE/NON-ACCIDENTAL DISCHARGE

Pursuant to Article 13.13.5.04.9 of the Ordinance, in the event of an accidental or a non-accidental discharge of either prohibited substances or an excess of regulated substances to the POTW, the permittee shall alert the District immediately upon occurrence. Within five (5) working days of the occurrence, the permittee shall provide written notification of the discharge. The notification shall specify no less than the following:

1. the location of the discharge;
2. the date and time of the discharge;
3. the type of waste discharged
4. the concentration and volume of the waste; and
5. an explanation of corrective actions taken

B. BYPASS NOTIFICATION

A bypass is an intentional diversion of waste streams from any portion of a User's treatment facility.

If an Industrial User knows in advance of the need for a bypass, it shall submit prior notice to the Control Authority, if possible at least ten days before the date of the bypass.

An Industrial User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Control Authority within 24 hours from the time the Industrial User becomes aware of the bypass. A written submission shall also be provided within 5 days of the time the Industrial User becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass. The Control Authority may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

C. OPERATING UPSETS

Pursuant to Article 13.13.5.04.9 of the Ordinance, and in the event of an operating upset, the permittee shall alert the District within 24 hours of recognition of the upset. Within five (5) days of recognition of the upset, the permittee shall submit a written follow-up report. The report shall specify no less than the following:

1. a description of the upset and its cause;
2. the impact of the upset on the permittee's compliance status;
3. the duration of non-compliance, including exact dates and times of noncompliance;
4. if noncompliance continues, the date by which compliance should be attained;
5. an explanation of actions to be taken to prevent recurrence of an upset or other condition of non-compliance.

D. SLUG CONTROL MODIFICATION

40 CFR 403.8(f)(2)(vi) and 40 CFR 403.12(f) require that IUs must immediately notify the POTW of any changes at the facility that change the potential for a slug discharge.

E. 24-HOUR VIOLATION NOTICE

Pursuant to Article 13.13.5.04.11 of the Ordinance, if sampling performed by an IU indicates a violation, the IU must notify the District within twenty four (24) hours of becoming aware of the violation. The IU shall also repeat the sampling and analysis and submit the results of the repeat analysis to the District within thirty (30) days after becoming aware of the violation. Resampling by the IU is not required if the District performs sampling at the IU's facility at least once a month, or if the District performs sampling at the IU between the time when the initial sampling was conducted and the time when the IU or the District receives the results of this sampling. If the District has performed the sampling and analysis in lieu of the IU, the District shall perform the repeat sampling and analysis.

STANDARD CONDITIONS

A. GENERAL CONDITIONS AND DEFINITIONS

1. Severability

The conditions of this permit are severable. Should any one condition be held invalid, all remaining conditions will not be affected and will continue in full force and effect.

2. Duty to Comply

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

3. Duty to Mitigate

The permittee must take all reasonable steps to maintain or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Permit Modification

East Chicago Sanitary District reserves the right to amend this permit in order to assure compliance by the District with applicable laws and regulations. The Discharger shall be informed of any proposed changes in the permit at least 30 days prior to the effective date of change. Any changes or new conditions in the permit shall include a reasonable time schedule for compliance.

5. Permit Revocation

Per Article 13.13.6.02 of the Ordinance, the District may revoke an individual wastewater discharge permit or terminate the discharge of an IU for good cause, including, but not limited to, the following reasons:

- (a) Failure to notify the District of significant changes to the wastewater prior to the changed discharge;
- (b) Failure to provide prior notification to the District of changed conditions pursuant to this Chapter;
- (c) Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application;
- (d) Falsifying self-monitoring reports and certification statements;
- (e) Tampering with monitoring equipment;
- (f) Refusing to allow the District timely access to the facility premises and records;
- (g) Failure to meet effluent limitations;
- (h) Failure to pay fines;
- (i) Failure to pay sewer charges;
- (j) Failure to meet compliance schedules;

- (k) Failure to complete a wastewater survey or the wastewater discharge permit application;
- (l) Failure to provide advance notice of the transfer of business ownership of a permitted facility; or
- (m) Violation of any Pretreatment Standard or Requirement, or any terms of the wastewater discharge permit or this Chapter.

6. Limitation on Permit Transfer

Per Article 13.13.5.03.7 of the Ordinance, permits are issued to a specific discharger for a specific operation and are not assignable to another discharger or transferable to any other location, without the proper written approval of the District.

Individual wastewater discharge permits may be transferred to a new owner or operator only if the permittee gives at least sixty (60) days advance notice to the District and the District approves the individual wastewater discharge permit transfer. The notice to the District must include a written certification by the new owner or operator which:

- (a) States that the new owner and/or operator have no immediate intent to change the facility's operations and processes;
- (b) Identifies the specific date on which the transfer is to occur; and
- (c) Acknowledges full responsibility for complying with the existing individual wastewater discharge permit.
- (d) Failure to provide advance notice of a transfer renders the individual wastewater discharge permit void as of the date of facility transfer.

7. Dilution

Per Article 13.13.3.02.5, the Discharger must not increase the use of potable or process water in any way, nor mix separate waste streams for the purpose of dilution of a discharge as a partial or complete substitute for adequate treatment to achieve compliance with standards set forth in this permit

8. Compliance with Applicable Pretreatment Standards and Requirements

All discharge must comply with all other applicable laws, regulations, standards, and requirements contained in Article 13.13.3.01 of the Ordinance and any applicable state and federal pretreatment laws, regulations, standards, and requirements, including any such laws, regulations, standards, or requirements that might become effective during the term of this permit.

B. OPERATIONS AND MAINTENANCE OF POLLUTION CONTROLS

1. Wastewater Pretreatment

Pursuant to Article 13.13.5.01, industrial users shall provide necessary wastewater treatment as required to comply with the Ordinance and all applicable pretreatment standards. Any facilities necessary for compliance shall be provided, operated, and

maintained at the IU's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the District for review, and shall be acceptable to the District before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the IU from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the District under the provisions of this Chapter. All new IU's shall install and start up all pollution control equipment necessary to comply with all Applicable Pretreatment Standards and Requirements, and shall achieve compliance immediately upon the commencement of discharge. Any subsequent changes in the pretreatment facilities or method of operation shall be reported to and be acceptable to the District prior to installation of the changes.

The discharger, in order to operate a wastewater or water treatment plant, shall be under the supervision of an operator with the qualifications as established in the Indiana Administrative Code, Title 327-IAC-5-22-7. All industrial pretreatment facilities shall be classified per Title 327-IAC-5-22-5. These classifications shall be based on the type of treatment afforded, design population equivalent, and the average daily flow.

2. Bypass of Treatment Facilities

Pursuant to 40 CFR, 403.17, the Discharger must not cause or allow any bypass to occur, except under the following conditions:

- (a) the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- (b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and
- (c) The IU submitted notices as required under the Notification Requirements listed in the Article 13.13.6.08 of the Ordinance.

3. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters must be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation Recovery Act.

C. MONITORING AND RECORDS

1. Representative Sampling and Measurements

Samples and measurements taken as required herein must be representative of the volume and nature of the monitored discharge. All samples must be taken at the monitoring points specified in this permit and unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water, or substance. All equipment used for sampling and analysis must be routinely calibrated, inspected, and maintained to ensure accuracy. Monitoring points must not be changed without notification and approval of the District.

2. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by the District, using the procedures prescribed in Title 40 CFR 136, the results of this monitoring must be submitted to the District within thirty (30) days.

3. Inspection and Sampling

Per Article 13.13.5.06 the Ordinance, The IU shall allow the District or its representatives, upon presentation of credentials of identification, to enter upon the premises of the IU at all reasonable hours for the purposes of inspection, sampling, or records examination. The IU shall allow the District to inspect and copy any and all records pertaining to pretreatment. The District shall have the right to set up on the IU's property such devices as are necessary to conduct sampling inspection, compliance monitoring, and/or metering operations.

4. Records Retention

Per Article 13.13.8.01 all Dischargers subject to the reporting requirements of this ordinance shall retain, and make available for inspection and copying, all records of information obtained pursuant to any monitoring activities required by this ordinance, any additional records of information obtained pursuant to monitoring activities undertaken by the IU independent of such requirements, and documentation associated with Best Management Practices. Records shall include the date, exact place, method, and time of sampling, and the name of the person(s) taking the samples; the dates analyses were performed; who performed the analyses; the analytical techniques or methods used; and the results of such analyses. These records shall remain available for a period of at least three (3) years. This period shall be automatically extended for the duration of any litigation concerning the IU or the District, or where the IU has been specifically notified of a longer retention period by the District

5. Signatory Requirements

All applications, reports, correspondence, or any information submitted to the District must be signed and dated by an authorized representative of the permittee.

An authorized representative as defined in Article 13.13.2.01 of the Ordinance is:

(a) If the User is a corporation:

(i) The president, secretary, treasurer, or a vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation; or

(ii) The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater discharge permit requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

- (b) If the User is a partnership or sole proprietorship: a general partner or proprietor, respectively.
- (c) If the User is a Federal, State, or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.
- (d) The individuals described in paragraphs 1 through 3, above, may designate a Duly Authorized Representative if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the District.

All applications, reports, or any information submitted to the District must contain the following certification statement:

öI certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.ö

6. Falsifying Information

Per Article 13.13.7.03 of the Ordinance any person who knowingly makes any false statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to this Chapter or Wastewater Discharge Permit issued under or by the authority of this Chapter, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method of sampling, measurement, or monitoring required under this Chapter commits a violation thereof and shall, upon conviction, be punished by the imposition of a civil penalty of not more than \$7,500.00 for each offense under this section. In addition, such person may be subject to criminal prosecution, punishable as a misdemeanor or felony under the laws of the State of Indiana (I.C. §13-30-10-1.5) and the United States (18 U.S.C. §1621, inter alia). The District may refer any incident of violation of this section to the County Prosecuting Attorney or the United States Attorney for the Northern District of Indiana for possible criminal prosecution.

D. FEES

1. Permit Application

The permittee must pay the permit application fees provided in Article 13.13.4.03 of the Ordinance

User Rates and Charges

The permittee is responsible for paying the rates and charges provided in Ordinance 15-0023.

E. ENFORCEMENT

1. Annual Publication

Per Article 13.13.6.13 of the Ordinance, a list of all industrial users which were, at any time during the previous twelve (12) months, in Significant Non-Compliance pursuant to 40 CFR §403.8(f)(2)(viii), shall be published annually by the District. Said list shall be published in the daily newspaper having the largest circulation with the City of East Chicago.

2. Civil Penalties

Pursuant to Article 122.13.7.01, in the event that an IU is found to have violated an order of the District, has failed to comply with any provision of this Chapter, the regulations or rules of the District, or permits issued hereunder, the District may find that an offense has occurred and impose monetary penalty of not less than \$1,000 nor more than the amount listed for each offense, or if not listed, then an amount not to exceed \$7,500.00 for each offense. Unless otherwise specified, each day a violation continues shall be deemed a separate offense.

3. Recovery of Costs Incurred by the District

Pursuant to Article 13.13.7.02 of the Ordinance, any IU violating any of the provisions of the Ordinance, or who discharges or causes a discharge producing an obstruction, or causes damage to or impairs the District's wastewater disposal system shall be liable to the District for any expense, loss, or damage caused by such violation or discharge. The District may bill the IU for the costs incurred by the District for any cleaning, repair, replacement, or other work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a violation of this Chapter enforceable under the provisions of Articles 6 and 7 hereof.



**EAST CHICAGO SANITARY DISTRICT
EAST CHICAGO, INDIANA
INDUSTRIAL WASTEWATER DISCHARGE PERMIT
OUTFALL NO. 901**

Issued to

**SAFETY-KLEEN SYSTEMS, INC.
601 Riley Road
East Chicago, IN**

Effective Date: July 7, 2020

Expiration Date: August 21, 2023

**Abderrahman Zehraoui, Ph.D.
Director of Utilities
Issued July 7, 2020**



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EAST CHICAGO SANITARY DISTRICT
EAST CHICAGO, INDIANA
INDUSTRIAL WASTEWATER DISCHARGE PERMIT
OUTFALL NO. 901

Issued to

SAFETY-KLEEN SYSTEMS, INC.

In compliance with Article 13.13.5.01 of the East Chicago Wastewater Ordinance No. 18-0017 (hereinafter "Ordinance"), the East Chicago Sanitary District (hereinafter "District"), by the issuance of this permit, authorizes:

Safety-Kleen Systems, Inc.
601 Riley Road
East Chicago, IN 46312

(hereinafter "permittee") to discharge from the above-identified facility the following, and only the following, specific wastewater streams:

- i) Sanitary wastewater
- ii) Centralized Waste Treatment (CWT) Point Source Category 40 CFR 437.47 & multiple waste streams, process water from re-refinery, emulsion breaking and dehydration processed
- iii) Wash waters from interior cleaning of railroad cars and tanker trucks used to bring oil processed on site
- iv) Non-contact cooling water from process operations
- v) Precipitation collection from process areas and tank farms
- vi) Process water from polychlorinated biphenyl (PSB) contaminated waste from PCB Destruction Facility (only when necessary with proper approval from the District)

This permit sets forth the standards required of the permittee by the District to ensure compliance with the limitations and conditions of the Ordinance and, where applicable, standards established by the State or Federal authorities.

In compliance with Article 13.13.5.03.4(b) of the Ordinance, the District designates both this permit and the permittee's discharge and sampling location by the **identification number 901.**

The monitoring facility is located at the effluent of the treatment system on the north end of the property where the flow meter is also located.

By the issuance of this permit, the District acknowledges that the permittee has complied with the application requirements set forth in Article 13.13.5.03.2 of the Ordinance.

By the issuance of this permit, the District acknowledges that the permittee has paid the assessed permit application fee as provided in Article 13.13.4.03 of the Ordinance.

Subject to the following paragraph, and unless otherwise specified, these requirements shall take effect upon issuance of this permit and shall remain in effect until the expiration date of this permit or until the permit is modified in accordance with Article 13.13.5.03.3 of the Ordinance. In accordance with Article 13.13.5.03.6 of the Ordinance, both this permit and the authorization to discharge will expire five (5) years from the date of issuance.

PROCESS DESCRIPTION

Safety-Kleen Systems, Inc. operates under the Categorical Pretreatment Standards of 40 CFR 437 Centralized Waste Treatment Point Source Category Subpart D 6 Multiple Wastestreams. Safety-Kleen System Inc.'s re-refinery operates two basic processes, distillation and hydrotreating. Used oil is distilled in a three-stage distillation system. The first step removes the water and any light hydrocarbons (e.g. gasoline and solvents). These materials are removed as a vapor, then condensed and separated. A fractionation unit separates the water and the light fuel which is used as a supplemental fuel in the process heaters at the site, or is sold as either an on or off- specification used oil fuel. The water generated in the re-refining process contains contaminants which are removed through further distillation prior to treatment in the facility's WWTP. These contaminants include sulfur compounds, ammonia, gasoline, alcohols, solvents and ethylene glycol from anti-freeze.

The pretreatment step occurs in a stripper called the Light Ends Recovery Tower (LERT). The water present in the incoming used oil and any process waters are fed to the LERT at different points depending on their physical and chemical characteristics. The LERT is a fractionation tower with a combination of trays and packing as internal components. The lower section of the LERT is designed to concentrate the higher boiling contaminants including trace amounts of oil and the Ethylene glycol. The Ethylene Glycol rich stream is segregated and sold as a recyclable product. The upper section of the LERT concentrates any low boiling point contaminants including gasolines, solvents, sulfur and nitrogen compounds. This stream is condensed and recovered as a fuel which is utilized in the re-refining process. The stripped water is removed as a side product and directed to the on-site waste water treatment plant. The dehydrated oil is then subjected to a second, more severe distillation step, vacuum fuel stripping (VFS) where the remaining fuel oils are removed using vacuum distillation. The vapor generated during this vacuum distillation stage is condensed to form a fuel similar to home heating fuel. This fuel is either used as fuel at the re-refinery, or sold as an on-specification used oil fuel.

The third distillation step utilizes a vacuum flash tower and two thin film evaporators. In the vacuum tower, the oil is subjected to high temperatures and low pressures, vaporizing the lighter lube oil fraction. This vapor is condensed and collected as lube oil. A set of wiper blades spread the heavier oil against the wall of the vessel, a heat exchanger, to help this material evaporate. A special high temperature heat transfer fluid is used to heat up the exchanger. Two grades of lube oil are produced in this third stage. Any material that does not evaporate in the evaporators is recovered and sold as an asphalt extender material, for use in refining and asphalt paving. After the reaction portion of the hydrotreating is completed the oil is fed into a vacuum fractionation tower. It is in this tower that the purified oil is fractionated into 3 distinct lube oil cuts (based on viscosity).

The wastewaters are treated in batches on a weekday operational basis. Average discharge from the re-refinery process is estimated at 80,000 gallons per day, with a maximum flow rate of 120,000 gallon per day. The average flows from the emulsion breaking and dehydration processes which are performed on a batch basis are 30 and 3,100 gallons per day, respectively.

EFFLUENT LIMITATIONS

A. CATEGORICAL LIMITATIONS

The permittee shall at no time discharge wastewater containing pollutants in excess of any of the following National Categorical Pretreatment Standards as established by 40 CFR Part 437 Subpart D (Multiple Waste Streams).

CATEGORICAL LIMITATIONS 40 CFR Part 437.25^[1]

PARAMETER	DAILY MAXIMUM LIMIT (mg/L)
Metal Parameters	
Chromium	0.947
Cobalt	56.4
Copper	0.405
Lead	0.222
Tin	0.249
Zinc	6.95
Organic Parameters	
Bis (2-ethylhexyl)phthalate	0.267
Carbazole	0.392
n-Decane	5.79
Fluoranthene	0.787
n-Octadecane	1.22

PARAMETER	MONTHLY MAXIMUM AVERAGE (mg/L)
Metal Parameters	
Chromium	0.487
Cobalt	18.8
Copper	0.301
Lead	0.172
Tin	0.146
Zinc	4.46
Organic Parameters	
Bis (2-ethylhexyl)phthalate	0.158
Carbazole	0.233
n-Decane	3.31
Fluoranthene	0.393
n-Octadecane	0.925

^[1] For any parameter that is covered by multiple pretreatment or local standards, the most stringent shall apply.

This specific list of contaminants shall not relieve the permittee of its responsibility to comply with all other specific pollutants as listed in the Ordinance 13.13.3.02.3. The district requires complete compliance with the Sewer User Ordinance and compliance with all local limitations

B. LOCAL LIMITATIONS

The permittee shall at no time discharge wastewater containing pollutants in excess of any of the following specific pollutant limitations (Local Limits) as established by Article 13.13.3.02.3 of the Ordinance:

Specific Pollutant Limitations

<u>Parameter</u> ^[3]	<u>Daily Maximum (mg/L)</u>
Arsenic	1.31
Chromium	7.0

Copper	0.88
Available Cyanide	0.019
Lead	2.28
Mercury	0.0002
Molybdenum	2.8
Nickel	0.80
Zinc	5.5
Fluoride	30
Phenols	0.96
Oil & Grease	117
Bis(2-ethylhexyl) Phthalate	1.03
Ammonia	134
Phosphorus	31
pH	5-10 s.u.

[3] For any parameter that is covered by multiple pretreatment or local standards, the most stringent shall apply.

C. EXCESS STRENGTH CHARGE LIMITATIONS

The Permittee shall be charged per pound in excess of any of the following excess strength charge limitations in accordance with rates established in Ordinance 15-0023.

Excess Strength Charge Limitations

<u>Parameter</u>	<u>Daily Maximum</u>
Chemical Oxygen Demand	250 mg/L
Total Suspended Solids	100 mg/L

D. GENERAL DISCHARGE PROHIBITIONS

Per Article 13.13.3.01.1 of the Ordinance the permittee must not discharge, directly or indirectly, any of the following described substances into the wastewater disposal system or otherwise to the facilities of the District:

1. Any pollutant which by reason of its nature or quantity is, or may be, sufficient either alone or by interaction to cause fire or explosion or be injurious in any way to the operation of the POTW. This prohibition shall include any wastestream with a closed cup flashpoint of less than 60 degrees Celsius (140 degrees Fahrenheit) using the test methods specified in 40 CFR 261.21, and any wastestream capable of causing an exceedance of ten (10 percent of the Lower Explosive Limit for flammable/explosive gases at any point within the POTW.
2. Any wastewater having a pH less than 5.0 or higher than 10.0 in any grab sample, or having any other corrosive property capable of causing damage or hazard to structures, equipment, or personnel of the system.
3. Any substance which may cause the POTW's effluent or treatment residues, sludges, or scums to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged to the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines, or regulations developed under Section 405 of the Act; any criteria, guidelines, or regulations affecting sludge use or disposal developed pursuant to the Solid Waste

Disposal Act, the Clean Air Act, the Toxic Substances Control Act, or State standards applicable to the sludge management method being used.

4. Trucked or hauled pollutants, except at discharge points designated by the District in accordance with §13.13.3.01.2 of this Chapter.
5. Any substance with objectionable color not removed in the treatment process, such as, but not limited to dye wastes and vegetable tanning solutions.
6. Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in Interference; but in no case, wastewater with a temperature at the introduction into the POTW which exceeds 40 degrees Celsius (104 degrees Fahrenheit).
7. Any slug load, which shall mean any pollutant, including oxygen demanding pollutants (BOD, COD, etc.), released in a discharge at a flow rate and/or pollutant concentration which will cause Interference to the POTW.
8. Petroleum, oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause Interference or pass through.
9. Any unpolluted water including, but not limited to, non-contact cooling water, unless otherwise authorized by the District.
10. Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the District in compliance with applicable State or Federal regulation.
11. Solid or viscous substances in amounts which will or may cause obstruction of the flow in the POTW or to the flow in a sewer resulting in interference with the operation of the POTW.
12. Any noxious or malodorous liquids, gases (including smoke, vapors, and fumes), or solids which either singly or by interaction are capable of creating a public nuisance or hazard to life or are sufficient to prevent entry into any part of the POTW for its maintenance and repair.
13. Any wastewater which causes a hazard to human life or creates a public nuisance.
14. Pollutants, substances, or wastewater prohibited by this Section shall not be processed or stored in such manner that they could be discharged to the POTW.

E. TRUCKED OR HAULED WASTE PROHIBITIONS

Per Article 13.13.3.01.2 the permittee must not discharge into the POTW collection system any wastewater or industrial waste which has been trucked, hauled or otherwise removed from its source prior to discharge, unless formal approval for such discharge has been granted by the District.

MONITORING REQUIREMENTS

A. SAMPLING PROCEDURES

All samples must be collected, preserved, and analyzed in accordance with the procedures established in 40 CFR Part 136, and amendments.

B. DISTRICT MONITORING RESPONSIBILITIES

40 CFR 403.12(g)(1) allows the POTW to sample in lieu of the IU. For the effective period of the permit, the District will monitor outfall 901 at the following frequency for the following parameters with the indicated methods, or another approved method found in 40 CFR Part 136 that has an Minimum Detection Limit (MDL) lower than the daily maximum effluent limitation:

Sample Parameter (units)	Measurement Location	Frequency	Method	Sample Type
COD (mg/L)	901	≤1/ month	EPA 410.4	24-hr composite ¹
TSS (mg/L)	901	≤1/ month	SM 2540 D	24-hr composite
Arsenic (mg/L) ²	901	≤1/ month	EPA 200.7	24-hr composite
Chromium (mg/L) ²	901	≤1/ month	EPA 200.7	24-hr composite
Cobalt (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Copper (mg/L) ²	901	≤1/ month	EPA 200.7	24-hr composite
Cyanide, Available (mg/L) ³	901	≤1/ month	EPA OIA-1677	grab
Lead (mg/L) ²	901	≤1/ month	EPA 200.7	24-hr composite
Mercury (mg/L) ²	901	≤1 months	EPA 245.1	24-hr composite
Molybdenum (mg/L) ²	901	≤1/ month	EPA 200.7	24-hr composite
Nickel (mg/L) ²	901	≤1/ month	EPA 200.7	24-hr composite
Tin (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Zinc (mg/L) ²	901	≤1/ month	EPA 200.7	24-hr composite
Bis(2-ethylhexyl) phthalate (mg/L)	901	≤1 month	EPA 625	24-hr composite
Carbazole	901	≤1/ 6 months	EPA 625	24-hr composite
n-Decane	901	≤1/ 6 months	EPA 625	24-hr composite
Fluoranthene (mg/L)	901	≤1/ month	EPA 625	24-hr composite
n-Octadecane	901	≤1/ 6 months	EPA 625	24-hr composite
Phenanthrene	901	≤1/ 6 months	EPA 625	24-hr composite
Non-Polar material (SGT-HEM)	901	≤1/ 6 months	EPA 1664B	grab
Oil & Grease (HEM) (mg/L)	901	≤1/ month	EPA 1664B	grab
Fluoride (mg/L)	901	≤1/ month	SM 4500-F C	24-hr composite
Phenols (mg/L)	901	≤1 month	EPA 420.1	24-hr composite
COD	901	≤1/ month	SM 5220 B	24-hr composite
Ammonia (mg/L)	901	≤1/ month	SM 4500-NH ₃ F	24-hr composite
Phosphorous (mg/L)	901	≤1/ month	SM 4500-P B	24-hr composite
pH (s.u.)	901	≤1/ month	EPA 150.2	grab
Temperature	901	≤1/ month	---	grab

C. PERMITTEE MONITORING RESPONSIBILITIES

For the effective period of the permit, the Permittee will monitor outfall 901 at the following frequency for the following parameters:

Sample Parameter (units)	Measurement	Frequency	Method	Sample Type
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¹ All composite samples shall be time proportional samples

	Location			
COD (mg/L)	901	≤1/ 6 months	EPA 410.4	24-hr composite ²
TSS (mg/L)	901	≤1/ 6 months	SM 2540 D	24-hr composite
Arsenic (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Chromium (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Cobalt (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Copper (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Cyanide, Available (mg/L) ³	901	≤1/ 6 months	EPA OIA-1677	grab
Lead (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Mercury (mg/L) ²	901	≤1/ 6 months	EPA 245.1	24-hr composite
Molybdenum (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Nickel (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Tin (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Zinc (mg/L) ²	901	≤1/ 6 months	EPA 200.7	24-hr composite
Bis(2-ethylhexyl) phthalate (mg/L)	901	≤1/ 6 months	EPA 625	24-hr composite
Carbazole (mg/L)	901	≤1/ 6 months	EPA 625	24-hr composite
n-Decane (mg/L)	901	≤1/ 6 months	EPA 625	24-hr composite
Fluoranthene (mg/L)	901	≤1/ 6 months	EPA 625	24-hr composite
n-Octadecane (mg/L)	901	≤1/ 6 months	EPA 625	24-hr composite
Phenanthrene (mg/L)	901	≤1/ 6 months	EPA 625	24-hr composite
Non-Polar material (SGT-HEM) (mg/L)	901	≤1/ 6 months	EPA 1664B	grab
Oil & Grease (HEM) (mg/L)	901	≤1/ 6 months	EPA 1664B	grab
Fluoride (mg/L)	901	≤1/ 6 months	SM 4500-F C	24-hr composite
Phenols (mg/L)	901	≤1/ 6 months	EPA 420.1	24-hr composite
COD (mg/L)	901	≤1/ 6 months	SM 5220 B	24-hr composite
Ammonia (mg/L)	901	≤1/ 6 months	SM 4500-NH ₃ F	24-hr composite
Phosphorous (mg/L)	901	≤1/ 6 months	SM 4500-P B	24-hr composite
pH (s.u.)	901	≤1/ 6 months	EPA 150.2	grab
Temperature	901	≤1/ 6 months	---	grab

For the effective period of the permit, the User will also monitor outfall 901 at the following frequency for the discharge flow volume.

Sample Parameter (units)	Measurement Location	Frequency	Sample Type
Flow	901	≤1/ month	Continuous

D. MONITORING FACILITY REQUIREMENTS

Per Article 13.13.5.05(f) of the Ordinance each Discharger must provide and operate at the Discharger's own expense, a monitoring facility to allow inspection, sampling, and flow measurement of each sewer discharge to the District. Each monitoring facility must be situated on the Discharger's premises, except where such a location would be impractical or cause undue hardship on the Discharger. The District may concur with the facility being constructed in the public street or sidewalk area providing that the facility is located so that it will not be obstructed by landscaping or parked vehicles. There must be ample room in or near said sampling facility to allow accurate sampling and preparation of samples for analysis. The facility, sampling, and measuring equipment must be maintained at all times in a safe and proper operating condition at the expense of the Discharger. All monitoring facilities must be constructed and maintained in accordance with all

² All composite samples shall be time proportional samples

applicable local construction standards and specifications. Construction must be completed within 120 days of receipt of the permit by the discharger.

REPORTING REQUIREMENTS

A. DISCHARGE VOLUME REPORTS

The permittee must report the total monthly flow in gallons from outfall 901 each month. Reports are due on or before the **10th of each month**. If the due date falls on a Saturday, Sunday or a legal holiday, then the due date is the next business day.

B. CALIBRATION REPORT

Pursuant to Article 13.13.5.05 (f) of the Ordinance, the permittee shall submit to the District written notification that calibration and maintenance have been performed on each flow-measuring device employed by the permittee no less than one time per year. The permittee shall submit to the District by April 10th of each year a report verifying calibration and maintenance of said measuring and recording equipment.

C. SELF-MONITORING REPORTS

All self-monitoring data shall be reported to the District in an agreed upon Electronic Data Deliverable (EDD) format. The permittee is required to submit to the District all data obtained through any self-monitoring of a discharge conducted in accordance with Title 40 CFR part 136. This data must be submitted within thirty (30) days of sampling.

Reports for parameters with a once per month (1/month) monitoring frequency must be submitted within 10 days after each calendar month.

Reports for parameters with a once per quarter (1/quarter) monitoring frequency must be submitted within 10 days after each reporting period. The reporting periods are January-March, April-June, July-September, and October-December. The first quarterly report is due no later than April 10th, 2019.

Reports for parameters with a once per six months (1/6 months) frequency must be submitted within 10 days after each reporting period. The reporting periods are January-June, and July- December. The first 1/6 month report is due July 10th, 2019.

All monitoring reports must indicate the nature and concentration of all pollutants in the effluent for which sampling and analysis were performed during the reporting period preceding the submission of each report, including measured maximum and average daily flows.

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by the U.S. Environmental Protection Agency (EPA) or as specified in this permit, the results of such monitoring must be included in any calculations of actual daily maximum or monthly average pollutant discharge, and results must be reported in the monthly report submitted to the District.

NOTIFICATION REQUIREMENTS

A. ACCIDENTAL DISCHARGE/NON-ACCIDENTAL DISCHARGE

Pursuant to Article 13.13.5.04.9 of the Ordinance, in the event of an accidental or a non-accidental discharge of either prohibited substances or an excess of regulated substances to the POTW, the permittee shall alert the District immediately upon occurrence. Within five (5) working days of the

occurrence, the permittee shall provide written notification of the discharge. The notification shall specify no less than the following:

1. the location of the discharge;
2. the date and time of the discharge;
3. the type of waste discharged
4. the concentration and volume of the waste; and
5. an explanation of corrective actions taken

B. BYPASS NOTIFICATION

A bypass is an intentional diversion of waste streams from any portion of a User's treatment facility. If an Industrial User knows in advance of the need for a bypass, it shall submit prior notice to the Control Authority, if possible at least ten days before the date of the bypass.

An Industrial User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Control Authority within 24 hours from the time the Industrial User becomes aware of the bypass. A written submission shall also be provided within 5 days of the time the Industrial User becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass. The Control Authority may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

C. OPERATING UPSETS

Pursuant to Article 13.13.5.04.9 of the Ordinance, and in the event of an operating upset, the permittee shall alert the District within 24 hours of recognition of the upset. Within five (5) days of recognition of the upset, the permittee shall submit a written follow-up report. The report shall specify no less than the following:

1. a description of the upset and its cause;
2. the impact of the upset on the permittee's compliance status;
3. the duration of non-compliance, including exact dates and times of noncompliance;
4. if noncompliance continues, the date by which compliance should be attained;
5. an explanation of actions to be taken to prevent recurrence of an upset or other condition of non-compliance.

D. SLUG CONTROL MODIFICATION

40 CFR 403.8(f)(2)(vi) and 40 CFR 403.12(f) require that IUs must immediately notify the POTW of any changes at the facility that change the potential for a slug discharge.

E. 24-HOUR VIOLATION NOTICE

Pursuant to Article 13.13.5.04.11 of the Ordinance, if sampling performed by an IU indicates a violation, the IU must notify the District within twenty four (24) hours of becoming aware of the violation. The IU shall also repeat the sampling and analysis and submit the results of the repeat analysis to the District within thirty (30) days after becoming aware of the violation. Resampling by the IU is not required if the District performs sampling at the IU's facility at least once a month, or if the District performs sampling at the IU between the time when the initial sampling was conducted and the time when the IU or the District receives the results of this sampling. If the District has performed the sampling and analysis in lieu of the IU, the District shall perform the repeat sampling and analysis.

STANDARD CONDITIONS

A. GENERAL CONDITIONS AND DEFINITIONS

1. Severability

The conditions of this permit are severable. Should any one condition be held invalid, all remaining conditions will not be affected and will continue in full force and effect.

2. Duty to Comply

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

3. Duty to Mitigate

The permittee must take all reasonable steps to maintain or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Permit Modification

East Chicago Sanitary District reserves the right to amend this permit in order to assure compliance by the District with applicable laws and regulations. The Discharger shall be informed of any proposed changes in the permit at least 30 days prior to the effective date of change. Any changes or new conditions in the permit shall include a reasonable time schedule for compliance.

5. Permit Revocation

Per Article 13.13.6.02 of the Ordinance, the District may revoke an individual wastewater discharge permit or terminate the discharge of an IU for good cause, including, but not limited to, the following reasons:

- (a) Failure to notify the District of significant changes to the wastewater prior to the changed discharge;
- (b) Failure to provide prior notification to the District of changed conditions pursuant to this Chapter;

- (c) Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application;
- (d) Falsifying self-monitoring reports and certification statements;
- (e) Tampering with monitoring equipment;
- (f) Refusing to allow the District timely access to the facility premises and records;
- (g) Failure to meet effluent limitations;
- (h) Failure to pay fines;
- (i) Failure to pay sewer charges;
- (j) Failure to meet compliance schedules;
- (k) Failure to complete a wastewater survey or the wastewater discharge permit application;
- (l) Failure to provide advance notice of the transfer of business ownership of a permitted facility; or
- (m) Violation of any Pretreatment Standard or Requirement, or any terms of the wastewater discharge permit or this Chapter.

6. Limitation on Permit Transfer

Per Article 13.13.5.03.7 of the Ordinance, permits are issued to a specific discharger for a specific operation and are not assignable to another discharger or transferable to any other location, without the proper written approval of the District.

Individual wastewater discharge permits may be transferred to a new owner or operator only if the permittee gives at least sixty (60) days advance notice to the District and the District approves the individual wastewater discharge permit transfer. The notice to the District must include a written certification by the new owner or operator which:

- (a) States that the new owner and/or operator have no immediate intent to change the facility's operations and processes;
- (b) Identifies the specific date on which the transfer is to occur; and
- (c) Acknowledges full responsibility for complying with the existing individual wastewater discharge permit.
- (d) Failure to provide advance notice of a transfer renders the individual wastewater discharge permit void as of the date of facility transfer.

7. Dilution

Per Article 13.13.3.02.5, the Discharger must not increase the use of potable or process water in any way, nor mix separate waste streams for the purpose of dilution of a discharge

as a partial or complete substitute for adequate treatment to achieve compliance with standards set forth in this permit

8. Compliance with Applicable Pretreatment Standards and Requirements

All discharge must comply with all other applicable laws, regulations, standards, and requirements contained in Article 13.13.3.01 of the Ordinance and any applicable state and federal pretreatment laws, regulations, standards, and requirements, including any such laws, regulations, standards, or requirements that might become effective during the term of this permit.

B. OPERATIONS AND MAINTENANCE OF POLLUTION CONTROLS

1. Wastewater Pretreatment

Pursuant to Article 13.13.5.01, industrial users shall provide necessary wastewater treatment as required to comply with the Ordinance and all applicable pretreatment standards. Any facilities necessary for compliance shall be provided, operated, and maintained at the IU's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the District for review, and shall be acceptable to the District before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the IU from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the District under the provisions of this Chapter. All new IU's shall install and start up all pollution control equipment necessary to comply with all Applicable Pretreatment Standards and Requirements, and shall achieve compliance immediately upon the commencement of discharge. Any subsequent changes in the pretreatment facilities or method of operation shall be reported to and be acceptable to the District prior to installation of the changes.

The discharger, in order to operate a wastewater or water treatment plant, shall be under the supervision of an operator with the qualifications as established in the Indiana Administrative Code, Title 327-IAC-5-22-7. All industrial pretreatment facilities shall be classified per Title 327-IAC-5-22-5. These classifications shall be based on the type of treatment afforded, design population equivalent, and the average daily flow.

2. Bypass of Treatment Facilities

Pursuant to 40 CFR, 403.17, the Discharger must not cause or allow any bypass to occur, except under the following conditions:

- (a) the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- (b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and
- (c) The IU submitted notices as required under the Notification Requirements listed in the Article 13.13.6.08 of the Ordinance.

3. Removed Substances

Solids, sludge, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters must be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation Recovery Act.

C. MONITORING AND RECORDS

1. Representative Sampling and Measurements

Samples and measurements taken as required herein must be representative of the volume and nature of the monitored discharge. All samples must be taken at the monitoring points specified in this permit and unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water, or substance. All equipment used for sampling and analysis must be routinely calibrated, inspected, and maintained to ensure accuracy. Monitoring points must not be changed without notification and approval of the District.

2. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by the District, using the procedures prescribed in Title 40 CFR 136, the results of this monitoring must be submitted to the District within thirty (30) days.

3. Inspection and Sampling

Per Article 13.13.5.06 the Ordinance, The IU shall allow the District or its representatives, upon presentation of credentials of identification, to enter upon the premises of the IU at all reasonable hours for the purposes of inspection, sampling, or records examination. The IU shall allow the District to inspect and copy any and all records pertaining to pretreatment. The District shall have the right to set up on the IU's property such devices as are necessary to conduct sampling inspection, compliance monitoring, and/or metering operations.

4. Records Retention

Per Article 13.13.8.01 all Dischargers subject to the reporting requirements of this ordinance shall retain, and make available for inspection and copying, all records of information obtained pursuant to any monitoring activities required by this ordinance, any additional records of information obtained pursuant to monitoring activities undertaken by the IU independent of such requirements, and documentation associated with Best Management Practices. Records shall include the date, exact place, method, and time of sampling, and the name of the person(s) taking the samples; the dates analyses were performed; who performed the analyses; the analytical techniques or methods used; and the results of such analyses. These records shall remain available for a period of at least three (3) years. This period shall be automatically extended for the duration of any litigation concerning the IU or the District, or where the IU has been specifically notified of a longer retention period by the District

5. Signatory Requirements

All applications, reports, correspondence, or any information submitted to the District must be signed and dated by an authorized representative of the permittee.

An authorized representative as defined in Article 13.13.2.01 of the Ordinance is:

(a) If the User is a corporation:

(i) The president, secretary, treasurer, or a vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation; or

(ii) The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater discharge permit requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

(b) If the User is a partnership or sole proprietorship: a general partner or proprietor, respectively.

(c) If the User is a Federal, State, or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.

(d) The individuals described in paragraphs 1 through 3, above, may designate a Duly Authorized Representative if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the District.

All applications, reports, or any information submitted to the District must contain the following certification statement:

öI certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.ö

6. Falsifying Information

Per Article 13.13.7.03 of the Ordinance any person who knowingly makes any false statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to this Chapter or Wastewater Discharge Permit issued under or by the authority of this Chapter, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method of sampling, measurement, or monitoring required under this Chapter commits a violation thereof and shall, upon conviction, be punished by the

imposition of a civil penalty of not more than \$7,500.00 for each offense under this section. In addition, such person may be subject to criminal prosecution, punishable as a misdemeanor or felony under the laws of the State of Indiana (I.C. §13-30-10-1.5) and the United States (18 U.S.C. §1621, inter alia). The District may refer any incident of violation of this section to the County Prosecuting Attorney or the United States Attorney for the Northern District of Indiana for possible criminal prosecution.

D. FEES

1. Permit Application

The permittee must pay the permit application fees provided in Article 13.13.4.03 of the Ordinance

User Rates and Charges

The permittee is responsible for paying the rates and charges provided in Ordinance 15-0023.

E. ENFORCEMENT

1. Annual Publication

Per Article 13.13.6.13 of the Ordinance, a list of all industrial users which were, at any time during the previous twelve (12) months, in Significant Non-Compliance pursuant to 40 CFR §403.8(f)(2)(viii), shall be published annually by the District. Said list shall be published in the daily newspaper having the largest circulation with the City of East Chicago.

2. Civil Penalties

Pursuant to Article 122.13.7.01, in the event that an IU is found to have violated an order of the District, has failed to comply with any provision of this Chapter, the regulations or rules of the District, or permits issued hereunder, the District may find that an offense has occurred and impose monetary penalty of not less than \$1,000 nor more than the amount listed for each offense, or if not listed, then an amount not to exceed \$7,500.00 for each offense. Unless otherwise specified, each day a violation continues shall be deemed a separate offense.

3. Recovery of Costs Incurred by the District

Pursuant to Article 13.13.7.02 of the Ordinance, any IU violating any of the provisions of the Ordinance, or who discharges or causes a discharge producing an obstruction, or causes damage to or impairs the District's wastewater disposal system shall be liable to the District for any expense, loss, or damage caused by such violation or discharge. The District may bill the IU for the costs incurred by the District for any cleaning, repair, replacement, or other work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a violation of this Chapter enforceable under the provisions of Articles 6 and 7 hereof.

ATTACHMENT 2
IU INSPECTION REPORTS

EAST CHICAGO SANITARY DISTRICT INDUSTRIAL PRETREATMENT INSPECTION REPORT

INSPECTION DATE: 10/17/19INSPECTOR: N. GerosSTARTING TIME: 10 am ENDING TIME: 11 am

RECEIVED
10-16-19
for M. Hamper
by N. Geros

A. BACKGROUND INFORMATION

1. Facility Name	Railroad Avenue Facility GATX		
2. Facility Address	4245 Railroad Avenue		
3. Person Contacted / Title	Martin Hamper, Director		
4. No. of Employees	Not applicable (NA)		
5. Shift Starting Time	Shift 1: (NA)	Shift 2: (NA)	Shift 3: (NA)
6. Inspection Type	Unannounced:		Scheduled: Yes

IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.

a) New Company	Yes:	No:
b) Complaint	Yes:	No:
c) Spill	Yes:	No:
d) Violation	Yes:	No:
e) Other	Yes:	No:

7. Explain Reason for Inspection:
Annual inspection

8. SPCC Plan Required and/or Slug Control Plan?	Yes	No X
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IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.

a) Is Plan on File?	Yes	No
b) Is Plan Adequate?	Yes	No

9. Explain Deficiencies in SPCC or Slug Control Plan?:

2

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 10/17/19

B. PRE-TREATMENT PERMIT		
1. Permit No. 112	2. Expiration Date: October 2, 2021	
3. Categorical Standard(s)		
4. Toxic Organic (Solvent) Management Plan Required	YES:	NO: X
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO:
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU? Well EW-1R has been removed from the system. There is the potential that a replacement well could be installed, but there are no definite plans at this time. There are no planned changes to the treatment system.		
7. Do Permit Limits Represent Current Operations?	YES: X	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES: X	NO:
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES: X	NO:
b) Are Reports Current?	YES: X	NO:
c) Are Reports Complete?	YES: X	NO:
9. Explain Deficiencies in Self-Monitoring Reports:		
10. Schematic or site map provided?	YES: X	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/ 17/ 19

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City:	Well: X	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer	360	100%	
b) Via NPDES Permit			
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process			
b) Contact Cooling			
a) Non-Contact Cooling			
b) Blow down			
a) Sanitary			
b) Other	360	100%	
TOTAL		100%	
4. Process Discharge Flow:	Continuous	Intermittent:	Batch:
		X	
If Batch	Gal/Batch:	Frequency	
5. Type of Flow Measurement	Totalizing Meter		
Adequate for Expected Flows?	YES: X		NO:
6. Date of Last Calibration:	Due April 10, 2020		
7. Number of Outfalls to POTW:	1		
8. Comments (Identify by Item No.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/ 17/ 19

D. Manufacturing Area			
1. Product(s) or Service(s) and General Description of Processes:			
Not applicable			
2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
3. Are there floor drains in the manufacturing areas?	YES:	NO:	
4. Do the floor drains lead directly to the POTW?	YES:	NO:	
5. Are temporary hoses in place as part of production?	YES:	NO:	
6. Process areas Inspected:			
7. Conditions / Operation	Good	Fair	Poor
8. General Housekeeping:	Good	Fair	Poor
9. Conditions:			
10. SPCC Practices Adequate?	YES:	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/ 17/ 19

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) *attach additional sheets if necessary:* Not applicable

Chemical Substance Inventory provided?

YES:

NO:

Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/ 17/ 19

F. Pre-Treatment Area				
1. Pretreatment System On-Site		YES: X	NO:	
2. Schematic or site map provided?		YES: X	NO:	
3. Description: <p>Groundwater pumped from extraction wells and wastewater from O&M activities treated by the designed remediation wastewater pre-treatment system consisting of oil water separation, bag filtration, zeolite adsorption and carbon adsorption.</p>				
4. Discharge	Continuous	Intermittent X	Batch	Other
5. Conditions / Operation		Good X	Fair	Poor
6. Comments (Reference any Deficiencies by item no.):				
7. Certified Operator(s)		Licensed No.	Class	
Kenneth R. Gaudet		WW020675	B	
8. SPCC Practices Adequate?		Yes: X	No:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/ 17/ 19

G. Chemical / Waste Storage Areas			
1. Sludge/Hazardous or Non-Hazardous Waste:		a) Pre-treatment sludge	
		b) Pre-treatment spent filters	
		c) OWS cleaning wastewater	
2. Source of Waste		a) Pre-treatment system operation	
		b)	
		c)	
3. Describe any Waste Handling (What happens to it?)		Containerized and shipped off-site for disposal	
4. Quantity		Two partially filled drums in treatment building, one full drum in shed	
5. Transport Company		Clean Harbors/Safety-Kleen	
6. Disposal Facility		Clean Harbors/Safety-Kleen	
7. On-Site Storage		Yes: X	No:
8. Describe (Include any Irregularities in Drums, Labels, or Manifests):			
9. Conditions:		Good X	Fair
			Poor
10. Floor Drains in Storage Areas?		Yes:	No: X
11. Are SPCC Practices Adequate?		Yes: X	No:
12. Comments (Reference any Deficiencies by item no.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/ 17/ 19

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES: X	NO:
2. Sample Collections Method: Grab and composite		
3. Is sampling location appropriate?	YES: X	NO:
4. IU and POTW sample at same location?	YES: X	NO:
5. Chain-of-Custody Adequate?	YES:	NO:
6. Sampling Equipment Adequate:	YES:	NO:
7. Sample type appropriate?	YES:	NO:
8. Sample containers Appropriate?	YES:	NO:
9. Samples Properly Preserved?	YES:	NO:
10. Holding times Short Enough?	YES:	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES:	NO:
12. Is sampling frequency correct?	YES:	NO:
13. IU certifying reports sent to POTW and IDEM?	YES:	NO:
14. Sampling SOP reviewed?	YES:	NO:
15. Sampling QA/QC documents reviewed?	YES:	NO:
16. Analysis conducted	In-House	Contract Lab (Name)
17. Self-Monitoring Records	YES:	NO:
18. All Analytical results on File?	YES:	NO:
19. Records Kept for Period Specified in Permit?	YES:	NO:
20. Comments (Reference any Deficiencies by item no.): Monitoring not yet conducted due to system not operating. Regarding H.5 through, no sampling conducted other than initial startup sample.		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/ 17/ 19

I. Final Comments

1. Questions/ Comments/ Discussion

2. Follow Up Actions Required

Inspector(s) Signature(s): _____ **Date:** _____

IU Representative Signature: Nicholas Heyes **Date:** 10/17/19

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 10/25/2019

INSPECTOR: Nickie Gees, Henry Padilla

STARTING TIME: 10:37 AM ENDING TIME: 12:41 p.m.

A. BACKGROUND INFORMATION			
1. Facility Name	Material Sciences Corporation – East Chicago		
2. Facility Address	4407 Railroad Avenue, Building #3 Door 3A, East Chicago, In 46312		
3. Person Contacted / Title	Kenneth Paxson, Q.A. Mgr 878-1920 3762		
4. No. of Employees	35		
5. Shift Starting Time	Shift 1: 5:00 AM	Shift 2: 5:00 PM	Shift 3: N/A
6. Inspection Type	Unannounced:		Scheduled: X
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	No:	
b) Complaint	Yes:	No:	
c) Spill	Yes:	No:	
d) Violation	Yes:	No:	
e) Other	Yes:	No:	
7. Explain Reason for Inspection: <u>Annual Inspection.</u>			
8. SPCC Plan Required and/or Slug Control Plan?	Yes X		No
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes X		No
b) Is Plan Adequate?	Yes X		No
9. Explain Deficiencies in SPCC or Slug Control Plan?:			
Slug Plan is not required. No Deficiencies to SPCC plan and plan on file.			

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**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 10 / 25 / 19

B. PRE-TREATMENT PERMIT		
1. Permit No. 312	2. Expiration Date: 7/14/2023	
3. Categorical Standard(s) Yes 433.10		
4. Toxic Organic (Solvent) Management Plan Required	YES:	NO: X
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO:
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU? The project to add two additional plating cells has been completed.		
7. Do Permit Limits Represent Current Operations?	YES: X	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES: X	NO:
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES: X	NO:
b) Are Reports Current?	YES: X	NO:
c) Are Reports Complete?	YES: X	NO:
9. Explain Deficiencies in Self-Monitoring Reports: They are all sent and no deficiencies were found.		
10. Schematic or site map provided?	YES: X on File	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/25/19

C. WATER/WASTEWATER Volume Calculations for 12/01/18 thru 9/30/19			
1. Source of Intake Water (GPD):	City: X	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer	1,029,362	46.7%	
b) Via NPDES Permit	0	0%	
c) Into Product	0	0%	
d) Evaporation	1,149,293	52.1%	
e) Other (Trucked Waste)	27,740	1.3%	
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process	713,175	69.3%	
b) Contact Cooling	0	0%	
a) Non-Contact Cooling	305,590	29.7%	
b) Blow down	Included with Non-Contact Cooling Water		
a) Sanitary	10,597	1.0%	
b) Other	0	0%	
TOTAL	1,029,362	100%	
4. Process Discharge Flow:	Continuous X	Intermittent	Batch
If Batch	Gal/Batch	Frequency	
5. Type of Flow Measurement	Isco 4320 Flow Totalizer, 8" Palmer Bowlus Flume, Omega FP85 Paddle Wheel Totalizer		
Adequate for Expected Flows?	YES: X	NO:	
6. Date of Last Calibration:	9/25/19		
7. Number of Outfalls to POTW:	1		
8. Comments (Identify by Item No.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/25/19

D. Manufacturing Area

1. Product(s) or Service(s) and General Description of Processes:

Service center for electro-plating, finishing and distribution of electro-galvanized flat, cold rolled carbon steel products.

We Process coiled steel strip into electro-galvanized steel strip with various post treatments applied to the surface of the zinc. It can take from 17 minutes up to 2 hours to process a single coil.

Major Customers are: Arcelor Mittal, SSAB, Protec/USS Steel, Greif Brothers and various service steel centers.

2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
Pre-Clean	Hot Water & Alkaline Spray Cleaning & Rinsing	No	Trucked Off-Site for treatment
Electro Degreasing	Hot Water & Alkaline Electrolytic Cleaning & Rinsing	Yes via on-site waste treatment	
Surface Activation	Mild Sulfuric Acid & Water Surface prep & rinsing	Yes via on-site waste treatment	
Plating & Rinsing	Electrolytic Zinc Plating & Hot Water Rinsing	Yes via on-site waste treatment	
Post Plating Surface Treatments	Phosphate, Chromate & Oils	NO	Trucked Off-Site for treatment
Phosphate Section Rinse water	Final Rinse water In Phosphate Section	Yes via on-site waste treatment	
3. Are there floor drains in the manufacturing areas?	YES:	NO: X	
4. Do the floor drains lead directly to the POTW?	YES:	NO: X	
5. Are temporary hoses in place as part of production?	YES: X	NO:	
6. Process areas Inspected:	Entire Facility inside. Improvements were made and other tanks not used were removed.		
7. Conditions / Operation	Good - Very Good & clean.	Fair	Poor
8. General Housekeeping:	Good - Kept clean & safe. Haz waste materials stored safely.	Fair	Poor
9. Conditions: Areas are Checked and have been improved for safety and spills. Everything is kept inside so nothing goes into the E.C. Sewers.			
10. SPCC Practices Adequate?	YES: X	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date:

10/25/19

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) attach additional sheets if necessary

Chemical Substance Inventory provided?				YES: X		NO:
Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes
Spray Clean 985 ECT	Liq	Y	330 gal tote	2,000		Contains potassium hydroxide, sodium hydroxide surfactants, phosphates and water
Electro-LV84	Liq	Y	330 gal tote	1,000 gals		Contains potassium hydroxide, sodium hydroxide surfactants, phosphates and water
1. Sulfuric Acid	Liq	Y	Bulk tank,	5,600 gals,		93% Technical grade Sulfuric Acid
2. Sulfuric Acid	Liq	Y	55 gal drums	750 gals		
Sodium Hydroxide	Liq	Y	Bulk Tank, 55 gal drums	5,600, 750 gals		50% Sodium Hydroxide solution
Metallic Zinc	Solid	Y	4,500 lb tote sacks	60,000 lbs		99.99% pure zinc shot for makine electrolyte soln
Electrolyte Solution	Liq	Y	76,000 gal tank	68,000-76,000 gal		Contains dissolvd zinc, sulfuric acid and water
Hydrochloric Acid	Liq	Y	55 gal drum	660 gal		30-35 % Active concentration of acid
Strontium Carbonate	Solid	Y	50 lb bags	2,500 lbs		
Diatomaceous Earth	Solid	Y	50 lb bags	2,,000 lbs		
Activator JW	Solid	Y	50 lb Carboy	300 lb		Contains tetra-sodium phosphate
Americo ZCN-98	Liq	Y	330 gal tote	660 gals		Contains nickel carbonate, phosphoric acid, zinc oxide, nitric acid & water
Various chrome solns	Liq	Y	55 gal drums	1,300 gal		Contains chromic acid, phosphoric acid, zinc salt, zinc oxide, silicon dioxide & acrylic polymers
Quaker Ferrocote 61 AUS	Liq	Y	300 gal totes	900 gal		Rust preventing oil compounds to protect product from corrosion
Quaker Ferrocote EGL-1	Liq	Y	300 gal totes	900 gal		Rust preventing oil compounds to protect product from corrosion
Quaker Ferrocote Mal-HCL-1	Liq	Y	55 gal drums	55 gal		Pre-lube oil
Hydraulic oil	Liq	Y	55 gal drums, (2) 500 gal tanks	440 gal 1,000 gals		
Maintenance oil & gear lubes	Liq	Y	55 gal drums	1,000 gal		
Hydrozone OS115	Liq	Y	55 gal drum	110 gal		Boiler Chemical- oxygen scavenger- contains sodium bisulfite
Hydrozone BFW 0106	Liq	Y	55 gal drum same	110 gal same		Boiler Chemical -Contains polymer, sodium hydroxide & potassium hydroxide

RLT 1136	Liq	Y	55 gal drum same	110 gal same		Steam line system chemical contains cyclohexylamine, n-ethyl-n-hydroxyethaneamine
Hydrozone CSC 1040	Liq	Y	Same as above	Same		Non-contact cooling water system corrosion Inhibitor-contains sodium hydroxide
Bellacide	Liq	Y	30 Gallon Drum	30-45 Gallons		Microbiocide for cooling water system Contains:tributyldecyl phosphonium chloride
Sod Hypochlorite	Liq	Y	Same as above	550 gals		Cooling water algaecide-12% concentration
Solar Salt	Solid	Y	50 lb bag	3,400 lbs		Used in water softeners
Calcium Chloride	Solid	Y	50 lb bag	3,400 lbs		Flake, 60% active, Used in Waste Treatment

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date:

10/25/19

F. Pre-Treatment Area				
1. Pretreatment System On-Site		YES: X	NO:	
2. Schematic or site map provided?		YES: X	NO:	
3. Description: Waste stream equalization, metals precipitation, neutralization, dewatering and sludge disposal. Pre-treatment plant typically operates from 5:00 AM to 11:00 PM. Discharge is continuous when the Pre-treatment plant is in operation				
4. Discharge	Continuous X	Intermittent	Batch	Other
5. Conditions / Operation		Good	Fair	Poor
6. Comments (Reference any Deficiencies by item no.): No. 3 Kept and maintained properly. Operator is Certified and operations are working as should be. When they are down for maintenance, he will call & let us know for monitoring purposes & to not come. Communication is excellent.				
7. Certified Operator(s)		Licensed No.	Class	
Kenneth Paxson		WW008970	C	
8. SPCC Practices Adequate?		Yes: ✓	No:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date:

10 / 25 / 19

G. Chemical / Waste Storage Areas

<p>1. Sludge/Hazardous or Non-Hazardous Waste:</p> <p style="text-align: center;">2019</p>	<p>a) waste treatment sludge (non-haz) b) Oil contaminated wastewater- (non-haz) c) Phosphate rinse waters (non—haz) d) Spent zinc waste-(non-haz) e) Electrolyte filter sludge (non-haz) f) Electrolyte pit & tank bottom Sludge (Haz, D002 & D008) g) Degrease pit & tank bottom sludge (Haz, D002) h) Liquid & solid chrome wastes – liquid (Haz, D002 & D007) solid chrome waste (Haz, D002) i) Oily rags (non-haz)</p>
<p>2. Source of Waste</p>	<p>a) From the Wastewater Pre-treatment system b) Preclean & Electro-degrease sections of the process line. c) Phosphating sect of process line. d) From the plating & plating rinse section of process line. e) From the plating & plating rinse section of process line. f) From the plating & plating rinse section of process line. g) From electro-cleaning section of the process line (alkaline) h) From the chromate section of the process line. i) Equipment maintenance</p>
<p>3. Describe any Waste Handling (What happens to it?)</p> <p style="text-align: center;">2019</p>	<p>a) Trucked off site to Waste Management Landfill b) Trucked Off-site for treatment & Disposal (Covanta & All Source Environmental) c) Trucked Off-site for treatment & Disposal (Covanta & All Source Environmental) d) Trucked Off-site for treatment & Disposal (Covanta) e) Trucked off site to Waste Management Landfill f) Trucked Off-site for treatment & Disposal (Covanta) g) Trucked Off-site for treatment & Disposal (Covanta) h) Trucked Off-site for treatment & Disposal (Covanta) i) Trucked Off-site for treatment & Disposal (Covanta)</p>
<p>4. Quantity</p> <p style="text-align: center;">January 1, 2019 thru November 30, 2019</p>	<p>a) 183 tons b) 223,500 gallons c) 22,350 gallons d) 20,410 lbs e) 4.0 Tons f) 9,460 lbs g) 0 lbs h) Liquid Chrome Waste = 16,985 lbs Solid Chrome Waste = 670 lbs i) 4,300 lbs</p>
<p>5. Transport Company</p>	<p>a) Waste Management b) Covanta & All Source Environmental c) Covanta & All Source Environmental d) Covanta e) Waste Management f) Covanta g) Covanta h) Covanta i) Covanta</p>
<p>6. Disposal Facility</p>	<p>a) Prairie View Landfill – Wyatt, Indiana b) Covanta – Portage, In. & Water Integrated Treatment Systems, Dolton, IL. c) Water Integrated Treatment Systems, Dolton, IL. & Covanta – Portage, In. d) Covanta – Portage, In. e) Prairie View Landfill – Wyatt, Indiana f) Covanta – Portage, In./AES Environmental - Calvert City, Kentucky g) Covanta – Portage, In./AES Environmental - Calvert City, Kentucky h) Envirite of Illinois – Harvey, IL. i) Covanta – Portage, In.</p>

7. On-Site Storage	Yes: <input checked="" type="checkbox"/> (90 Day Accumulation Only)	No:
8. Describe (Include any Irregularities in Drums, Labels, or Manifests): Everything is labelled properly & stored, documented. No problems to report.		
9. Conditions:	Good ^{Very} Good	Fair Poor
10. Floor Drains in Storage Areas?	Yes:	No: <input checked="" type="checkbox"/>
11. Are SPCC Practices Adequate?	Yes: <input checked="" type="checkbox"/>	No:
12. Comments (Reference any Deficiencies by item no.): Very well Kept so no spilled drums may escape of anything liquid out of the storage area of their chemicals. No problems to report.		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/25/19

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES: X	NO:
2. Sample Collections Method: Combination of Grabs and 24 hour composite sample as required by the constituent being sampled		
3. Is sampling location appropriate?	YES: ✓	
4. IU and POTW sample at same location?	YES: N/A	NO:
5. Chain-of-Custody Adequate?	YES: ✓	NO:
6. Sampling Equipment Adequate:	YES: ✓	NO:
7. Sample type appropriate?	YES: ✓	NO:
8. Sample containers Appropriate?	YES: ✓	NO:
9. Samples Properly Preserved?	YES: ✓	NO:
10. Holding times Short Enough?	YES: ✓	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES: ✓	NO:
12. Is sampling frequency correct?	YES: ✓	NO:
13. IU certifying reports sent to POTW and IDEM?	YES: X	NO:
14. Sampling SOP reviewed?	YES: ✓	NO:
15. Sampling QA/QC documents reviewed?	YES: ✓	NO:
16. Analysis conducted	In-House	Contract Lab (Name) Test America
17. Self-Monitoring Records	YES: ✓	NO:
18. All Analytical results on File?	YES: ✓	NO:
19. Records Kept for Period Specified in Permit?	YES: X	NO:
20. Comments (Reference any Deficiencies by item no.): No deficiencies. Records & Reports, data have been sent.		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 10/25/19

I. Final Comments

1. Questions/ Comments/ Discussion

None Required

2. Follow Up Actions Required

Documents for Flow Diagrams of Water & Wastewater Treatment
are the same & operators license WW Class III updated 2020.
Nothing else Required

Inspector(s) Signature(s):

Nickie Dyer

Date: 10/25/19

IU Representative Signature:

Shunelle Dapson

Date: 10/25/2019

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 5 / 2019

INSPECTOR: Nickie Geros/Henry Padilla

STARTING TIME: 10:00 AM

ENDING TIME: 12:00 PM

A. BACKGROUND INFORMATION			
1. Facility Name	W.R. Grace		
2. Facility Address	5215 Kennedy Ave		
3. Person Contacted / Title	Carl Muehlman EHS Manager		
4. No. of Employees	51		
5. Shift Starting Time	Shift1: 11:00pm to 7:00am	Shift2: 7:00am to 3:00pm	Shift3: 3:00pm to 11:00pm
6. Inspection Type	Unannounced:		Scheduled: X
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:		No:
b) Complaint	Yes:		No:
c) Spill	Yes:		No:
d) Violation	Yes:		No:
e) Other	Yes:		No:
7. Explain Reason for Inspection: Significant Industrial Users Annual Inspection			
8. SPCC Plan Required and/or Slug Control Plan?	Yes X		No
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes X		No
b) Is Plan Adequate?	Yes X		No
9. Explain Deficiencies in SPCC or Slug Control Plan?:			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 5 / 2019

B. PRE-TREATMENT PERMIT		
1. Permit No. 401	2. Expiration Date: 5-1-2021	
3. Categorical Standard(s)	No	
4. Toxic Organic (Solvent) Management Plan Required	YES:	NO: X
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO:
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU? Future planned changes include update to their current wastewater treatment facility. Will keep us posted.		
7. Do Permit Limits Represent Current Operations?	YES: X	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES:	NO: X
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES:	NO:
b) Are Reports Current?	YES:	NO:
c) Are Reports Complete?	YES:	NO:
9. Explain Deficiencies in Self-Monitoring Reports:		
10. Schematic or site map provided?	YES: X Sanitary, process, & site maps	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 5 / 2019

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City: X	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer	2,474,000	100%	
b) Via NPDES Permit			
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process			
b) Contact Cooling			
a) Non-Contact Cooling			
b) Blow down			
a) Sanitary	Minimal < 10,000		
b) Other			
TOTAL	2,474,000	100%	
4. Process Discharge Flow:	Continuous	Intermittent X	Batch
If Batch	Gal/Batch	Frequency	
5. Type of Flow Measurement	6" Bailey/Fisher & Porter Magnetic Accuracy 0.5% of rate from 2% to 100% of meter Cal Factor; 0.01% of Cal Factor from 0% to 2% of Cal Factor		
Adequate for Expected Flows?	YES: X		NO:
6. Date of Last Calibration:	October 31 st 2019		
7. Number of Outfalls to POTW:	One		
8. Comments (Identify by Item No.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 5 / 2019

D. Manufacturing Area			
1. Product(s) or Service(s) and General Description of Processes: Sodium Silicate and Colloidal Silica Water glass Ludox			
2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
Sanitary	Locker room & washrooms	Yes	
Process	Sodium Silicate and Colloidal Silica	No	Grand Calumet river
3. Are there floor drains in the manufacturing areas?	YES: X	NO:	
4. Do the floor drains lead directly to the POTW?	YES:	NO: X	
5. Are temporary hoses in place as part of production?	YES:	NO: X	
6. Process areas Inspected:	All of facility, inside, outside, storage areas, labs, production areas and tanks		
7. Conditions / Operation	Good X	Fair	Poor
8. General Housekeeping:	Good X	Fair	Poor
9. Conditions: Storage of product for shipment is Excellent and very clean.			
10. SPCC Practices Adequate?	YES: X	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 5 / 2019

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) <i>attach additional sheets if necessary</i>						
Chemical Substance Inventory provided?				YES: <input checked="" type="checkbox"/>		NO:
Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes
Sulfuric Acid	Yes	Yes	13,500 & 4,500 gal		Yes	Raw material & Wastewater treatment chemicals
Caustic (50%) Sodium Hydroxide	Yes	Yes	29,000 & 4,200 gal		Yes	Finished product additives & Wastewater treatment chemicals
Aluminum Chlorhydrate (Chlorhydrol)	Yes	Yes	55 gal		Yes	Finished product additives
Ammonium Hydroxide	Yes	Yes	250 gal		Yes	Finished product additives
Betz Cortrol IS3080K Sodium Bisulfite	Yes	Yes	110 gal		Yes	Boiler water treatment chemicals
Betz Optisperse APO200 K	Yes	Yes	110 gal		Yes	Boiler water treatment chemicals
Betz Polyfloc AP1138 B1		Yes	50 lb bags		Yes	Wastewater treatment chemicals
Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes

BioBan BP		Yes	30 lb keg		Yes	Finished product additives
Dowicil 150	Yes	Yes	5 gal		Yes	Finished product additives
Ethylene Glycol	Yes	Yes	55 gal		Yes	Finished product additives
Kathon LX (14%)	Yes	Yes	5 gal		Yes	Finished product additives
Lime (Calcium Hydroxide)		Yes	Silo		Yes	Wastewater treatment chemicals
Lithium Hydroxide		Yes	50 lb bag		Yes	Finished product additives
Petroleum products	Yes	Yes	270 gal, 55 gal & 5 gal		Yes	Lubricating oil, fuel, gasoline, Crystal Kleen, Gear oil
Ludox Colloidal Silica	Yes	Yes	55 to 50,000		Yes	Finished products
Sand		Yes	Silo		Yes	Raw material
Soda Ash (Sodium Carbonate)		Yes	Silo		Yes	Raw material
Sodium Aluminate	Yes	Yes	55 gal		Yes	Finished product additives
Sodium Silicate	Yes	Yes	20,000		Yes	Raw material & Finished products

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 5 / 2019

G. Chemical / Waste Storage Areas		<i>Quantity/yr Transport Co.</i>	
1. Sludge / Hazardous Waste:	a) Lab solvent hazardous CESQG	200 lbs	Tradebe
	b) Sodium Silicate amorphous glass non-hazardous	80 tons	Republic
	c) Cleaning solvent non-hazardous	120gal	Crystal Kleen
	d) Waste oil non-hazardous	165gal	Future/Niles
	e) Universal waste non-hazardous	500 Lt. bulbs	W.M Lamp-tracker
	f) Filter press cake non-hazardous	3,345 tons	Z-Force
	g) Tank cleaning bottoms non-hazardous	300 tons	Republic
2. Source of Waste	<i>Disposal facility</i>		
	a) Lab test procedure	Tradebe	
	b) Production glass chain	Newton Co. Landfill	
	c) Parts cleaning. 20 gal tank. Christal Clean recycled	Recycled	
	d) Gear box and hydraulic oil changes on equipment	Recycled	
	e) Light bulbs, batteries & ballasts	Recycled	
	f) Solid cake from waste water treatment filter press	Newton Co. Landfill	
	g) Solids settled to the bottom of our silicate storage tanks	Newton Co.	
3. Describe Hazardous Waste Handling	Lab generated a few once at a time, placed in a satellite accumulation container then transferred to a 5 gallon container for shipment.		
4. Quantity	Less than 200 lbs per year		
5. Transport Company	Tradebe		
6. Disposal Facility	Tradebe		
7. On-Site Storage	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>	
8. Describe (Include any Irregularities in Drums, Labels, or Manifests)			
9. Conditions:	Good <input checked="" type="checkbox"/>	Fair <input type="checkbox"/>	Poor <input type="checkbox"/>
10. Floor Drains in Storage Areas?	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>	
11. Are SPCC Practices Adequate?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>	
12. Comments (Reference any Deficiencies by item no.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 5 / 2019

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES:	NO: X
2. Sample Collections Method:		
3. Is sampling location appropriate?		
4. IU and POTW sample at same location?	YES:	NO:
5. Chain-of-Custody Adequate?	YES:	NO:
6. Sampling Equipment Adequate:	YES:	NO:
7. Sample type appropriate?	YES:	NO:
8. Sample containers Appropriate?	YES:	NO:
9. Samples Properly Preserved?	YES:	NO:
10. Holding times Short Enough?	YES:	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES:	NO:
12. Is sampling frequency correct?	YES:	NO:
13. IU certifying reports sent to POTW and IDEM?	YES:	NO:
14. Sampling SOP reviewed?	YES:	NO:
15. Sampling QA/QC documents reviewed?	YES:	NO:
16. Analysis conducted	In-House	Contract Lab (Name)
17. Self-Monitoring Records	YES:	NO:
18. All Analytical results on File?	YES:	NO:
19. Records Kept for Period Specified in Permit?	YES:	NO:
20. Comments (Reference any Deficiencies by item no.):		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 5 / 2019

I. Final Comments

1. Questions/ Comments/ Discussion

No longer uses Formaldehyde

2. Follow Up Actions Required

Inspector(s) Signature(s): HP **Date:** 11/5/19

IU Representative Signature: Carl S. Muehlman **Date:** 11/5/19

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

ATTACHMENT C

EAST CHICAGO SANITARY DISTRICT INDUSTRIAL PRETREATMENT INSPECTION REPORT


INSPECTION DATE: 1/10/19

INSPECTOR: Nickie Gerus

STARTING TIME: 10:25^{AM} ENDING TIME: 11:20AM

A. BACKGROUND INFORMATION #411			
1. Facility Name	USS Lead Refinery		
2. Facility Address	5300 Kennedy Ave.		
3. Person Contacted / Title	Jeffrey Walker (317) 366-6500		
4. No. of Employees	2 ix/mw		
5. Shift Starting Time	Shift 1:	Shift 2:	Shift 3:
6. Is the IU under a current or pending enforcement action?	YES:	NO: <input checked="" type="checkbox"/>	Reason:
7. Is the IU on a compliance schedule?	YES:	NO: <input checked="" type="checkbox"/>	Meeting Schedule? <input checked="" type="checkbox"/>
8. Inspection Type	Unannounced:		Scheduled: <input checked="" type="checkbox"/>
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 10			
a) New Company	YES:	NO: <input checked="" type="checkbox"/>	
b) Complaint	YES:	NO: <input checked="" type="checkbox"/>	
c) Spill	YES:	NO: <input checked="" type="checkbox"/>	
d) Violation	YES: ,	NO: <input checked="" type="checkbox"/>	
e) Other	YES:	NO: <input checked="" type="checkbox"/>	
9. Explain Reason for Inspection: Am Insp. 20 - soil within & purge water, will be disposed of. 55 gal			
10. SPCC Plan Required?	YES:	NO: <input checked="" type="checkbox"/>	
IF REQUIRED PROCEED, OTHERWISE GO TO ITEM No. 12			
a) Is Plan on File?	YES:	NO:	
b) Is Plan Adequate?	YES:	NO:	

c) Is Plan Being Implemented?	YES:	NO:
11. Explain Any Deficiencies in SPCC Plan?		
13. Has ECSD Evaluated the Need for a Slug Control Plan?	YES:	NO:
12. Slug Control Plan Required?	YES:	NO:
IF REQUIRED PROCEED, OTHERWISE GOT TO pg. 3		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
c) Is Plan Being Implemented?	YES:	NO:
13. Explain Any Deficiencies in Slug Control Plan:		

B. PRE-TREATMENT PERMIT			
1. Permit No. 411		2. Expiration Date:	
2. Categorical Standard(s)			
3. Toxic Organic (Solvent) Management Plan Required		YES:	NO:
If required, Proceed, Otherwise go to Item No. 6.			
a) Is Plan on File?		YES:	NO:
b) Is Plan Adequate?		YES:	NO:
4. Production Based Standard Applicable?		YES:	NO:
If So, current Average Production Rate(s)			
5. Are there any changes since last inspection or planned changes to the UI?			
6. Do Permit Limits Represent Current Operations?		YES: ✓	NO:
If not, what changes are necessary?			
7. Are Self-Monitoring Reports Required?		YES:	NO:
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.			
a) Are Reports on File?		YES:	NO:
b) Are Reports Current?		YES:	NO:
c) Are Reports Complete?		YES:	NO:
8. Explain Deficiencies in Self-Monitoring Reports:			
<div style="text-align: center;">  </div>			
9. Schematic or site map provided?		YES:	NO: ✓

C. WATER/WASTEWATER SUMMARY				
1. Source of Intake Water (GPD):		City:	Well:	Other:
2. Discharge Method: <i>Groundwater</i>		Volume (GPD) Month		Percent of Total
a) Into Sewer				

b) Via NPDES Permit (provide permit#)		
c) Into Product		
d) Evaporation		
e) Other		
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total
a) Industrial Process		
b) Contact Cooling		
a) Non-Contact Cooling		
b) Blow down		
a) Sanitary		
b) Other (Specify)		
TOTAL		100%
4. Process Discharge Flow:	Continuous	Intermittent Batch
If Batch	Gal/Batch	Frequency
5. Type of Flow Measurement		
Adequate for Expected Flows? <input checked="" type="checkbox"/>	YES:	NO:
6. Date of Last Calibration:	from name paperwork	
7. Number of Outfalls to POTW:		
8. Comments (Identify by Item No.):		

D. Manufacturing Area			
1. Product(s) or Service(s) and General Description of Processes:			
2. Process Wastestream(s)	Description	To Sewer	To other (Specify)
3. Are there standard operating procedures (SOPs) for process?	YES:	NO:	
a) Are SOPs on file?	YES:	NO:	
b) Are SOPs adequate?	YES:	NO:	
c) Are SOPs being implemented?	YES:	NO:	
4. Are there floor drains in the manufacturing areas?	YES:	NO:	
5. Do the floor drains lead directly to the POTW?	YES:	NO:	
6. Are temporary hoses in place as part of production?	YES:	NO:	
7. Process areas Inspected:			
8. Conditions / Operation	Good	Fair	Poor

9. General Housekeeping:	Good ✓	Fair	Poor
10. Conditions:			

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) *attach additional sheets if necessary*

Chemical Substance Inventory provided?				YES:	NO:	
Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes

F. Pre-Treatment Area				
1. Pretreatment System On-Site		YES:	NO:	
2. Schematic or site map provided?		YES:	NO:	
3. Are there standard operating procedures (SOPs) for treatment?		YES:	NO:	
a) Are SOPs on file?		YES:	NO:	
b) Are SOPs adequate?		YES:	NO:	
c) Are SOPs being implemented?		YES:	NO:	
4. Description:				
5. Discharge	Continuous	Intermittent	Batch	Other
6. Conditions / Operation		Good	Fair	Poor
7. Comments (Reference any Deficiencies by item no.):				
8. Certified Operator(s)		Licensed No.	Class	
9. SPCC Practices Adequate?		Yes:	No:	

G. Chemical / Waste Storage Areas			
1. Sludge / Hazardous Waste: <i>none</i>		a) <i>Soil cutting & pipe waste</i>	
		b)	
		c)	
2. Source of Waste		a)	
		b)	
		c)	
3. Describe Hazardous Waste Handling			
4. Quantity		<i>22 -</i>	
5. Transport Company			
6. Disposal Facility			
7. On-Site Storage		YES: <input checked="" type="checkbox"/> <i>any drum</i>	NO:
8. Describe (Include any Irregularities in Drums, Labels, or Manifests): <i>Will let me know how many drums & who will & where it will go - * per EPA</i>			
9. Conditions:		Good <input checked="" type="checkbox"/>	Fair <input type="checkbox"/> Poor <input checked="" type="checkbox"/>
10. Floor Drains in Storage Areas?		YES:	NO: <input checked="" type="checkbox"/>
11. Are SPCC Practices Adequate?		YES:	NO: <input checked="" type="checkbox"/>
12. Comments (Reference any Deficiencies by item no.): <i>cut & easy to get to</i>			

H. Industrial Self-Monitoring		
1. Is Self –Monitoring Required?	YES: <input checked="" type="checkbox"/>	NO:
2. Sample Collections Method: <i>IX/Qu.</i>		
3. Is sampling location appropriate?	YES: <input checked="" type="checkbox"/>	NO:
4. IU and POTW sample at same location?	YES: <input checked="" type="checkbox"/>	NO:
5. Chain-of-custody adequate?	YES: <input checked="" type="checkbox"/>	NO:
6. Sampling equipment adequate:	YES:	NO:
7. Sample type appropriate?	YES:	NO:
8. Sample containers appropriate?	YES:	NO:
9. Samples properly preserved?	YES:	NO:
10. Holding times short enough?	YES:	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136? <input checked="" type="checkbox"/>	YES:	NO:
12. Is sampling frequency correct?	YES: <input checked="" type="checkbox"/>	NO:
13. IU certifying reports sent to POTW and IDEM?	YES:	NO:
14. Sampling SOP reviewed?	YES:	NO:
15. Sampling QA/QC documents reviewed?	YES:	NO:
16. Analysis conducted	In-House	Contract Lab (Name)
17. Self-Monitoring Records	YES: <input checked="" type="checkbox"/>	NO:
18. All analytical results on File?	YES: <input checked="" type="checkbox"/>	NO:
19. Records kept for period specified in permit?	YES:	NO:
20. Comments (Reference any Deficiencies by item no.): <i>Was not 4th Qu 2018 sent</i>		

I. Final Comments

1. Questions/ Comments/ Discussion

2. Follow Up Actions Required

Inspector(s) Signature(s):

Nickie Geros

Date:

1-10-19

IU Representative Signature:

[Signature]

Date:

1-10-19

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 12 / 12 / 2019

INSPECTOR: Henry Padilla

STARTING TIME: 9:30 AM ENDING TIME: 11:15 AM

A. BACKGROUND INFORMATION #514			
1. Facility Name	<u>National Material Processing Company 2+3</u>		
2. Facility Address	<u>4502 / 4506 Cline Ave East Chicago IL 46312</u>		
3. Person Contacted / Title	<u>Ryan Raiser - Plant Manager (219) 391-6003</u>		
4. No. of Employees	<u>24</u>		
5. Shift Starting Time	Shift 1: <u>11p-7a</u>	Shift 2: <u>7a-3p</u>	Shift 3: <u>3p-11p</u>
6. Inspection Type	Unannounced:	Scheduled: <u>X</u>	
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	No:	
b) Complaint	Yes:	No:	
c) Spill	Yes:	No:	
d) Violation	Yes:	No:	
e) Other	Yes:	No:	
7. Explain Reason for Inspection:			
8. SPCC Plan Required and/or Slug Control Plan?	Yes <u>✓</u>		No <u>not Required</u>
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes <u>X</u>	No	
b) Is Plan Adequate?	Yes <u>X</u>	No	
9. Explain Deficiencies in SPCC or Slug Control Plan?:			

EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT

INSPECTION DATE: 12/12/2019

B. PRE-TREATMENT PERMIT		
1. Permit No. <u>514</u>	2. Expiration Date:	
3. Categorical Standard(s)		
4. Toxic Organic (Solvent)	YES:	NO: <u>X</u>
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO: <u>X</u>
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU?		
7. Do Permit Limits Represent Current Operations?	YES: <u>X</u>	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES: <u>X</u>	NO:
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES: <u>X</u>	NO:
b) Are Reports Current?	YES: <u>X</u>	NO:
c) Are Reports Complete?	YES: <u>X</u>	NO:
9. Explain Deficiencies in Self-Monitoring Reports: <u>None</u>		
10. Schematic or site map provided?	YES: <u>X</u>	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12-11-2019

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City: <input checked="" type="checkbox"/>	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer	1,600,000	100%	
b) Via NPDES Permit			
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process			
b) Contact Cooling			
a) Non-Contact Cooling			
b) Blow down			
a) Sanitary			
b) Other			
TOTAL			
4. Process Discharge Flow:	Continuous <input checked="" type="checkbox"/>	Intermittent:	Batch:
If Batch	Gal/Batch:	Frequency	
5. Type of Flow Measurement	Totalizing Meter		
Adequate for Expected Flows?	YES: <input checked="" type="checkbox"/>	NO:	
6. Date of Last Calibration:			
7. Number of Outfalls to POTW:	1		
8. Comments (Identify by Item No.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date:

12/12/2019

D. Manufacturing Area

1. Product(s) or Service(s) and General Description of Processes:

Hydrochloric Acid pickling of steel coils

2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
<i>Acid</i>	<i>Bath</i>	<i>N</i>	<i>Spent pickle liquor</i>
<i>Rinse Water</i>	<i>Rinse tank</i>	<i>Y</i>	
3. Are there floor drains in the manufacturing areas?	YES:	NO: <i>X</i>	
4. Do the floor drains lead directly to the POTW?	YES:	NO: <i>X</i>	
5. Are temporary hoses in place as part of production?	YES:	NO: <i>X</i>	
6. Process areas Inspected:	<i>All areas inside Plants, pretreatment & monitoring sites outside</i>		
7. Conditions / Operation	Good <i>✓</i>	Fair	Poor
8. General Housekeeping:	Good <i>✓</i>	Fair	Poor
9. Conditions:			
10. SPCC Practices Adequate?		YES: <i>✓</i>	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/12/2019

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) *attach additional sheets if necessary:* on file

Chemical Substance Inventory provided?

YES: to

NO:

Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/12/2019

F. Pre-Treatment Area				
1. Pretreatment System On-Site		YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>	
2. Schematic or site map provided?		YES: <input checked="" type="checkbox"/> <i>on file</i>	NO: <input type="checkbox"/>	
3. Description:				
4. Discharge	Continuous <input checked="" type="checkbox"/>	Intermittent	Batch	Other
5. Conditions / Operation	Good <input checked="" type="checkbox"/>	Fair	Poor	
6. Comments (Reference any Deficiencies by item no.):				
7. Certified Operator(s)	Licensed No.		Class	
<i>NO</i>				
8. SPCC Practices Adequate?				
Yes: <input checked="" type="checkbox"/>		No: <input type="checkbox"/>		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/12/2019

G. Chemical / Waste Storage Areas			
1. Sludge/Hazardous or Non-Hazardous Waste: c) Hg lamps f) recycled waste g) oil dry		a) Spent pickle liquor - non haz b) Clarifier - rinse water - non haz c) Waste oil - non haz. d) Filter non haz	
2. Source of Waste		a) Kemira b) to city c)	
3. Describe any Waste Handling (What happens to it?)			
4. Quantity	a) 4800 gal/day b) 45 gal/min c) 2000 gal/quarterly d) 4x/year		
5. Transport Company	a) Kemira g) waste management		
6. Disposal Facility			
7. On-Site Storage	Yes: <input checked="" type="checkbox"/>	No:	
8. Describe (Include any Irregularities in Drums, Labels, or Manifests): <div style="font-size: 1.2em; margin-top: 10px;">None</div>			
9. Conditions:	Good <input checked="" type="checkbox"/>	Fair	Poor
10. Floor Drains in Storage Areas?	Yes:	No: <input checked="" type="checkbox"/>	
11. Are SPCC Practices Adequate?	Yes:	No:	
12. Comments (Reference any Deficiencies by item no.): <div style="height: 100px;"></div>			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/12/2019

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
2. Sample Collections Method: Grab and composite		
3. Is sampling location appropriate?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
4. IU and POTW sample at same location?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
5. Chain-of-Custody Adequate?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
6. Sampling Equipment Adequate:	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
7. Sample type appropriate?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
8. Sample containers Appropriate?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
9. Samples Properly Preserved?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
10. Holding times Short Enough?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
12. Is sampling frequency correct?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
13. IU certifying reports sent to POTW and IDEM?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
14. Sampling SOP reviewed?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
15. Sampling QA/QC documents reviewed?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
16. Analysis conducted	in-house	Contract Lab (Name): Mostardi Plott
17. Self-Monitoring Records	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
18. All Analytical results on File?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
19. Records Kept for Period Specified in Permit?	YES: <input checked="" type="checkbox"/>	NO: <input type="checkbox"/>
20. Comments (Reference any Deficiencies by item no.): All up to date		

EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT

Inspection Date: 12/12/2019

I. Final Comments

1. Questions/ Comments/ Discussion

2. Follow Up Actions Required

None

Inspector(s) Signature(s): *[Signature]* Date: 3/13/2020
IU Representative Signature: *[Signature]* Date: 3/13/2020

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 12/6/19

INSPECTOR: Nickie Geras, Henry Padilla

STARTING TIME: ^{10:19}~~9:00~~ A.M. ENDING TIME: 11:00 A.M.

A. BACKGROUND INFORMATION #518 aka Londellbasell			
1. Facility Name	IcoPolymers		
2. Facility Address			
3. Person Contacted / Title	Jason Bush - Health Safety Manager		
4. No. of Employees	200		
5. Shift Starting Time	Shift 1:	Shift 2:	Shift 3:
6. Inspection Type	Unannounced:	Scheduled: <input checked="" type="checkbox"/>	
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	No: <input checked="" type="checkbox"/>	
b) Complaint	Yes:	No: <input checked="" type="checkbox"/>	
c) Spill	Yes:	No: <input checked="" type="checkbox"/>	
d) Violation	Yes:	No: <input checked="" type="checkbox"/>	
e) Other	Yes: <input checked="" type="checkbox"/>	No:	
7. Explain Reason for Inspection: Annual Insp.			
8. SPCC Plan Required and/or Slug Control Plan?	Yes		No
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes		No
b) Is Plan Adequate?	Yes		No
9. Explain Deficiencies in SPCC or Slug Control Plan?:			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 12/6/19

B. PRE-TREATMENT PERMIT

1. Permit No. <u>518</u>	2. Expiration Date:	
3. Categorical Standard(s)	NO	
4. Toxic Organic (Solvent) Management Plan Required	YES:	NO: <input checked="" type="checkbox"/>
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO: <input checked="" type="checkbox"/>
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU? <i>New piece of extruding equipment Silo placed in 2018 for Color used any color TSG Sept 2018 - pellets + powder</i>		
7. Do Permit Limits Represent Current Operations?	YES: <input checked="" type="checkbox"/>	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES:	NO: <input checked="" type="checkbox"/>
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES:	NO:
b) Are Reports Current?	YES:	NO:
c) Are Reports Complete?	YES:	NO:
9. Explain Deficiencies in Self-Monitoring Reports:		
10. Schematic or site map provided?	YES:	NO: <input checked="" type="checkbox"/>

① Need ask Joe plans Johnny Sewer ditch to Enclid?

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/6/19

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City:	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer			
b) Via NPDES Permit			
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process			
b) Contact Cooling			
a) Non-Contact Cooling			
b) Blow down			
a) Sanitary			
b) Other			
TOTAL		100%	
4. Process Discharge Flow:	Continuous	Intermittent	Batch
If Batch	Gal/Batch	Frequency	
5. Type of Flow Measurement	<i>New one placed in this early 2019</i>		
Adequate for Expected Flows?	YES:	NO:	
6. Date of Last Calibration:			
7. Number of Outfalls to POTW:			
8. Comments (Identify by Item No.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/6/19

D. Manufacturing Area

1. Product(s) or Service(s) and General Description of Processes:

TS2

2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
3. Are there floor drains in the manufacturing areas?	YES:	NO:	
4. Do the floor drains lead directly to the POTW?	YES:	NO:	
5. Are temporary hoses in place as part of production?	YES:	NO:	
6. Process areas Inspected:			
7. Conditions / Operation	Good	Fair	Poor
8. General Housekeeping:	Good	Fair	Poor
9. Conditions:			
10. SPCC Practices Adequate?	YES:	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ____/____/____

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) *attach additional sheets if necessary*

Chemical Substance Inventory provided?

YES:

NO:

Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes

EAST CHICAGO SANITARY DISTRICT INDUSTRIAL PRETREATMENT INSPECTION REPORT

Inspection Date: _____/_____/_____

F. Pre-Treatment Area				
1. Pretreatment System On-Site		YES:	NO: ✓	
2. Schematic or site map provided?		YES:	NO:	
3. Description:				
4. Discharge	Continuous	Intermittent	Batch	Other
5. Conditions / Operation	Good		Fair	Poor
6. Comments (Reference any Deficiencies by item no.):				
7. Certified Operator(s)		Licensed No.	Class	
8. SPCC Practices Adequate?		Yes:	No:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ____/____/____

G. Chemical / Waste Storage Areas			
1. Sludge/Hazardous or Non-Hazardous Waste:		a)	
		b)	
		c)	
2. Source of Waste		a)	
		b)	
		c)	
3. Describe any Waste Handling (What happens to it?)			
4. Quantity			
5. Transport Company			
6. Disposal Facility			
7. On-Site Storage		Yes:	No:
8. Describe (Include any Irregularities in Drums, Labels, or Manifests):			
9. Conditions:		Good	Fair
			Poor
10. Floor Drains in Storage Areas?		Yes: ✓	No:
11. Are SPCC Practices Adequate?		Yes:	No:
12. Comments (Reference any Deficiencies by item no.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ____/____/____

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES:	NO: ✓
2. Sample Collections Method:		
3. Is sampling location appropriate?		
4. IU and POTW sample at same location?	YES:	NO:
5. Chain-of-Custody Adequate?	YES:	NO:
6. Sampling Equipment Adequate:	YES:	NO:
7. Sample type appropriate?	YES:	NO:
8. Sample containers Appropriate?	YES:	NO:
9. Samples Properly Preserved?	YES:	NO:
10. Holding times Short Enough?	YES:	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES:	NO:
12. Is sampling frequency correct?	YES:	NO:
13. IU certifying reports sent to POTW and IDEM?	YES:	NO:
14. Sampling SOP reviewed?	YES:	NO:
15. Sampling QA/QC documents reviewed?	YES:	NO:
16. Analysis conducted	In-House	Contract Lab (Name)
17. Self-Monitoring Records	YES:	NO:
18. All Analytical results on File?	YES:	NO:
19. Records Kept for Period Specified in Permit?	YES:	NO:
20. Comments (Reference any Deficiencies by item no.):		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/6/19

I. Final Comments

1. Questions/ Comments/ Discussion

2. Follow Up Actions Required

- 1.) Past Insp. to send to Jason
- 2.) Report to me
- * 3.) Sewer disch outside - where & plans?
- 4.) meter ^{New} placed in 2019

Inspector(s) Signature(s):

Nickie Hros

Date:

12-6-19

IU Representative Signature:

[Signature]

Date:

12-6-19

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11/18/2019

INSPECTOR: Henry Padilla

STARTING TIME: 10:00 a.m. **ENDING TIME:** 10:30 a.m.

A. BACKGROUND INFORMATION: Outfall No. 521			
1. Facility Name	Lakeshore Railcar & Tanker Services LLC (LSRS)		
2. Facility Address	1150 E. 145 th St. East Chicago, IN 46312		
3. Person Contacted / Title	James Kornas, V.P. Operations, Patriot Rail; 219-392-8100 ofc, 904-528-8629 cell David Hric, Wastewater Operator, LSRS 219-392-8108 ofc, 219-614-4026 cell Lee Walter, Sr. Engineer, PM Environmental 865-221-7870 ofc, 865-765-1059 cell		
4. No. of Employees	Twenty-Three (23) Water treatment in 2019 was typically daily M-F.		
5. Shift Starting Time	Shift 1: 6:00am-4:00pm	Shift 2: N/A	Shift 3: N/A
6. Inspection Type	Unannounced:		Scheduled: X
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	No:	
b) Complaint	Yes:	No:	
c) Spill	Yes:	No:	
d) Violation	Yes:	No:	
e) Other	Yes:	No:	
7. Explain Reason for Inspection: Scheduled Annual Site Inspection			
8. SPCC Plan Required and/or Slug Control Plan?	Yes X		No
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes X		No
b) Is Plan Adequate?	Yes X		No
9. Explain Deficiencies in SPCC or Slug Control Plan: Updates needed to cover the new WWTP tanks and operations recently installed.			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11/18/19

B. PRE-TREATMENT PERMIT		
1. Permit No. 521	2. Expiration Date: 05/20/2013	
3. Categorical Standard(s) Yes, X; CWT Operations scheduled for startup on 11/25/19.		
4. Toxic Organic (Solvent)	YES:	NO: X
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO:
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU? A Change in Conditions has occurred. New Treatment system components with an upgraded capacity of 100 gpm. IU intends to begin CWT treatment operations and receiving outside wastewater on 11/25/19. This wastewater will initially consist of petroleum contact water (PCW) and oily vegetable-based waters. See Memo from PM Environmental on 11/18/19 summarizing the Change in Conditions.		
7. Do Permit Limits Represent Current Operations?	YES: X	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES: X	NO:
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES: X	NO:
b) Are Reports Current?	YES: X	NO:
c) Are Reports Complete?	YES: X	NO:
9. Explain Deficiencies in Self-Monitoring Reports: <i>None to Report, all were sent.</i>		
10. Schematic or site map provided?	YES: X	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11/18/19

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City: X	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer	451,779	100%	
b) Via NPDES Permit			
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process	451,946		
b) Contact Cooling			
a) Non-Contact Cooling			
b) Blow down			
a) Sanitary			
b) Other			
TOTAL			
4. Process Discharge Flow:	Continuous	Intermittent:	Batch: X
If Batch	Gal/Batch: ~10,000	Frequency: ~8 hrs./day	
5. Type of Flow Measurement	Totalizing Meter – Laser Flow Sensor – ISCO Signature Ser. No. 217B00086; 0-100 gpm		
Adequate for Expected Flows?	YES: X		NO:
6. Date of Last Calibration:	10/31/19		
7. Number of Outfalls to POTW:	1		
8. Comments (Identify by Item No.): New treatment system will operate as batch treatment system process and typical batches will be 10,000 - 20,000 gallons.			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11/18/19

D. Manufacturing Area #521			
1. Product(s) or Service(s) and General Description of Processes: Tanker truck and rail car cleaning. Residual product (heel) is collected and disposed of off site at third party disposal vendor. Cars are cleaned and rinsed, and rinse waters are collected for treatment. Offsite waste (PCW & vegetable based oily waters) is received at the facility in tankers (rail and truck) and are treated through the pre-treatment system and then discharged to the ECSD POTW through outfall #521.			
2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
Non-Haz Sludge Generated	Non-Haz Sludge		Landfill
Recovered Oils	Non-Haz Oil		To recycling
3. Are there floor drains in the manufacturing areas?	YES:	NO: X	
4. Do the floor drains lead directly to the POTW?	YES:	NO: X	
5. Are temporary hoses in place as part of production?	YES:	NO: X	
6. Process areas Inspected:	Pre-treatment system, inside storage tank washing, Haz & Non-Haz waste storage building, railcars outside, small building outside and entire property. General storage of ~250 rail cars on site for cleaning operations.		
7. Conditions / Operation	Good X	Fair	Poor
8. General Housekeeping:	Good X	Fair	Poor
9. Conditions:			
10. SPCC Practices Adequate?	YES: X	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11/18/19

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) *attach additional sheets if necessary:*

Chemical Substance Inventory provided?				YES: X		NO:
Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes
Caustic	X	X	(1) 375 gal Tote	375 gals	X	
Sulfuric Acid	X	X	(8) 55 gal Drums	440 gals	X	
Coagulant	X	X	(1) 375 gal Tote	375 gals	X	
Flocculant	X	X	(4) 5 gal Buckets	20 gals	X	
Hydrogen Peroxide	X	X	(4) 55 gal Drums	220 gals	X	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11/18/19

F. Pre-Treatment Area #521				
1. Pretreatment System On-Site		YES: X	NO:	
2. Schematic or site map provided?		YES: X	NO:	
3. Description: 				
4. Discharge	Continuous	Intermittent X	Batch X	Other
5. Conditions / Operation		Good X	Fair	Poor
6. Comments (Reference any Deficiencies by item no.): Current operator David Hric has an IN apprentice certification, working in conjunction with Sam Harris's Illinois Class 3 Group 3 & 4 license under agreement with the City. Lakeshore is currently looking to hire a licensed Indiana Class B operator in the near future.				
7. Certified Operator(s)	Licensed No.		Class	
David Hric	WWA00432 (Apprentice)		B	
Sam Harris	Illinois License		Class 3 Industrial Operator	
8. SPCC Practices Adequate?	Yes: X		No:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11/18/19

G. Chemical / Waste Storage Areas #521			
1. Sludge/Hazardous or Non-Hazardous Waste:		a) Non-Haz Sludge	
		b) Hazardous Drums/Totes	
		c) Non-Hazardous Drums/Totes	
2. Source of Waste		a) Sludge created by DAF Unit & Plate Clarifier	
		b) Residual product from truck tanker and railcar cleaning	
		c) Residual product from truck tanker and railcar cleaning	
3. Describe any Waste Handling (What happens to it?)		Waste is categorized, drummed and sent off-site for disposal within 90 days	
4. Quantity		15-20 drums per month. 825-1100 gallons	
5. Transport Company		Various – depending on Hazardous/Non-Hazardous characterizations	
6. Disposal Facility		Various – depending on Hazardous/Non-Hazardous characterizations	
7. On-Site Storage		Yes: X	No:
8. Describe (Include any Irregularities in Drums, Labels, or Manifests): NONE			
9. Conditions:		Good X	Fair
10. Floor Drains in Storage Areas?		Yes:	No: X
11. Are SPCC Practices Adequate?		Yes: X	No:
12. Comments (Reference any Deficiencies by item no.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11/18/19

H. Industrial Self-Monitoring #521		
1. Is Self-Monitoring Required?	YES: X	NO:
2. Sample Collections Method: Grab and composite		
3. Is sampling location appropriate?	YES: X	NO:
4. IU and POTW sample at same location?	YES: X	NO:
5. Chain-of-Custody Adequate?	YES: X	NO:
6. Sampling Equipment Adequate:	YES: X	NO:
7. Sample type appropriate?	YES: X	NO:
8. Sample containers Appropriate?	YES: X	NO:
9. Samples Properly Preserved?	YES: X	NO:
10. Holding times Short Enough?	YES: X	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES: X	NO:
12. Is sampling frequency correct?	YES: X	NO:
13. IU certifying reports sent to POTW and IDEM?	YES: X	NO:
14. Sampling SOP reviewed?	YES: X	NO:
15. Sampling QA/QC documents reviewed?	YES: X	NO:
16. Analysis conducted		Contract Lab (Name) TestAmerica
17. Self-Monitoring Records	YES: X	NO:
18. All Analytical results on File?	YES: X	NO:
19. Records Kept for Period Specified in Permit?	YES: X	NO:
20. Comments (Reference any Deficiencies by item no.): All Up to date		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11/18/19

I. Final Comments #521

1. Questions/ Comments/ Discussion

2. Follow Up Actions Required

Inspector(s) Signature(s):



Date: 3-4-2020

IU Representative Signature:



Date: 03/04/2020

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90



**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 12/11/2019

INSPECTOR: Henry Padilla

STARTING TIME: 10:30 a.m. **ENDING TIME:** 11:40 a.m.

A. BACKGROUND INFORMATION			
1. Facility Name	Praxair, Inc. Production Gas		
2. Facility Address	4400 Kennedy Avenue		
3. Person Contacted / Title	Mark Fazio/ Facility Manager 219-391-5173 Christian Garcia/Plant Superintendent 219-391- 5201 Bikram Shrestha/ Environmental Specialist 219-391-5118 Lora Grisolia/Plant Engineer 219-391-5964		
4. No. of Employees	100 7days 2-12hr shifts, some 8hr shifts M-F		
5. Shift Starting Time	Shift 1:	Shift 2: x	Shift 3: x
6. Inspection Type	Unannounced:		Scheduled: x
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	No:	
b) Complaint	Yes:	No:	
c) Spill	Yes:	No:	
d) Violation	Yes:	No:	
e) Other	Yes:	No:	
7. Explain Reason for Inspection: Annual Inspection			
8. SPCC Plan Required and/or Slug Control Plan?	Yes x SPCC		No x Slug Plan not Required
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes x	No	
b) Is Plan Adequate?	Yes x	No	
9. Explain Deficiencies in SPCC or Slug Control Plan:			
No deficiencies.			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 12/11/2019

B. PRE-TREATMENT PERMIT		
1. Permit No. 531	2. Expiration Date: 11/22/2021	
3. Categorical Standard(s)	No <input checked="" type="checkbox"/>	
4. Toxic Organic (Solvent) Management Plan Required	YES:	NO: <input checked="" type="checkbox"/>
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO: <input checked="" type="checkbox"/>
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU? No		
7. Do Permit Limits Represent Current Operations?	YES: <input checked="" type="checkbox"/>	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES:	NO: <input checked="" type="checkbox"/>
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES:	NO:
b) Are Reports Current?	YES:	NO:
c) Are Reports Complete?	YES:	NO:
9. Explain Deficiencies in Self-Monitoring Reports:		
10. Schematic or site map provided?	YES:	NO: <input checked="" type="checkbox"/>

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/11/2019

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City:	Well:	Other:
2. Discharge Method:	Volume Month	Percent of Total	
a) Into Sewer	9,659,100	100%	
b) Via NPDES Permit			
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process x- boiler blow down x – water softeners	109,500	1%	
b) Contact Cooling			
a) Non-Contact Cooling x – cooling towers	4,437,600	46%	
b) Blow down – x truck wash x Compressor condensate	462,000	5%	
a) Sanitary x- offices & East Garage	330,000	3%	
b) Other x-Retention Pond	4,320,000	(45%) As needed basis	
TOTAL	9,659,100	100%	
4. Process Discharge Flow:	Continuous x	Intermittent	Batch
If Batch	Gal/Batch	Frequency	
5. Type of Flow Measurement	OCF-IVA Greyline		
Adequate for Expected Flows?	YES: x	NO:	
6. Date of Last Calibration:	10/8/19		
7. Number of Outfalls to POTW:	1		
8. Comments (Identify by Item No.):			
Cooling tower water increases when the temperature is hot and humid.			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/11/2019

D. Manufacturing Area

1. Product(s) or Service(s) and General Description of Processes:

Facility produces Gaseous Oxygen, Nitrogen and Neon; Liquid Oxygen, Nitrogen, Argon, Krypton, Xenon, and Hydrogen by cryogenic air separation process.

Liquid Hydrogen Plant: Receive GH₂ from Whiting Facility

2 SO₄ Tanks

See page 5 for Chemicals used in process

2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
1.	Cooling tower-compressor cooling	Y	
2.	Boiler blow down	Y	
3.	Cooling tower blow down	Y	
4.	Compressor Condensate	Cooling tower- small amount	
5.	Boiler water softeners	Yes	
6.	Retention Pond	Yes	As needed basis.
3. Are there floor drains in the manufacturing areas?	YES:	NO: x	
4. Do the floor drains lead directly to the POTW?	YES:	NO: x	
5. Are temporary hoses in place as part of production?	YES:	NO: x	
6. Process areas Inspected:	Entire facility, cooling towers and storage areas		
7. Conditions / Operation	Good x	Fair	Poor
8. General Housekeeping:	Good x	Fair	Poor
9. Conditions:			
10. SPCC Practices Adequate?	YES: x	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/11/2019

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) *attach additional sheets if necessary*

Chemical Substance Inventory provided?				YES: x		NO:
Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes
SO4 Sulfuric Acid 93%	Y	Y	1000 gal	2000 gal	Yes	Outside containment and storage
MCP600	Y	Y	5 gal & 30 gal	80 gal	Yes	Inside Containment and Storage
Sodium Hypochlorite NaOCl	Y	Y	1000 gal	2000 gal	Yes	Inside Containment and Storage
GN8020	Yes	Yes	330 gal	660 gal	Yes	Inside Containment and Storage
AZ8104	Yes	Yes	330 gal	660 gal	Yes	Inside Containment and Storage
NA2460	Yes	Yes	400 gal	400 gal	Yes	Inside Containment and Storage
Optispirse PO50101	Yes	Yes	400 gal	400 gal	Yes	Inside Containment and Storage
Corrshield NT4207	Yes	Yes	55 gal	Not stored onsite	Yes	Used as needed on containment
AF1441 Antifoam	Yes	Yes	5 gal	10 gal	Yes	Used as needed on containment
SOLUS AP23	Yes	Yes	30 gal	60 gal	Yes	Inside Containment and Storage

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/11/2019

F. Pre-Treatment Area				
1. Pretreatment System On-Site		YES:	NO: x	
2. Schematic or site map provided?		YES:	NO:	
3. Description:				
4. Discharge	Continuous	Intermittent	Batch	Other
5. Conditions / Operation		Good	Fair	Poor
6. Comments (Reference any Deficiencies by item no.):				
7. Certified Operator(s)		Licensed No.		Class
8. SPCC Practices Adequate?		Yes:		No:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/11/2019

G. Chemical / Waste Storage Areas		Outfall No. 531	
1. Sludge/Hazardous or Non-Hazardous Waste: d) batteries	a) Safety-Kleen non-haz, parts cleaner		
	b) oil non-haz, superior oil		
	c) Fluorescent bulbs to higher efficiency bulbs		
2. Source of Waste	a) parts cleaner		
	b) used oil		
	c) Universal waste and d) batteries		
3. Describe any Waste Handling (What happens to it?)	a) stored in 35 gal/55 gal sealed drums with good housekeeping rules applied b) properly labeled, manifested & disposed of using approved suppliers c) stored in designated location, properly labeled		
4. Quantity	a) Aqua based 30 gal – picked up every 3 months b) Universal waste picked up within 180 days		
5. Transport Company	a) Safety Kleen		
6. Disposal Facility	a) Safety Kleen, Dolton, IL		
7. On-Site Storage		Yes: x	No:
8. Describe (Include any Irregularities in Drums, Labels, or Manifests): Floor drains in parts cleaner area.			
9. Conditions:		Good X	Fair
10. Floor Drains in Storage Areas?		Yes:	No: x
11. Are SPCC Practices Adequate?		Yes: x	No:
12. Comments (Reference any Deficiencies by item no.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/11 /2019

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES:	NO: x
2. Sample Collections Method:		
3. Is sampling location appropriate?		
4. IU and POTW sample at same location?	YES:	NO:
5. Chain-of-Custody Adequate?	YES:	NO:
6. Sampling Equipment Adequate:	YES:	NO:
7. Sample type appropriate?	YES:	NO:
8. Sample containers Appropriate?	YES:	NO:
9. Samples Properly Preserved?	YES:	NO:
10. Holding times Short Enough?	YES:	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES:	NO:
12. Is sampling frequency correct?	YES:	NO:
13. IU certifying reports sent to POTW and IDEM?	YES:	NO:
14. Sampling SOP reviewed?	YES:	NO:
15. Sampling QA/QC documents reviewed?	YES:	NO:
16. Analysis conducted	In-House	Contract Lab (Name)
17. Self-Monitoring Records	YES:	NO:
18. All Analytical results on File?	YES:	NO:
19. Records Kept for Period Specified in Permit?	YES:	NO:
20. Comments (Reference any Deficiencies by item no.):		


**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**


Inspection Date: 12/11/2019

I. Final Comments

1. Questions/ Comments/ Discussion

2. Follow Up Actions Required

Inspector(s) Signature(s):  **Date:** 1/6/2020

IU Representative Signature:  **Date:** 1/6/2020

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 19 / 19

INSPECTOR: Henry Padilla

STARTING TIME: 10 A ENDING TIME: 10:47 am

A. BACKGROUND INFORMATION			
#541			
1. Facility Name	PRAXAIR, INC RARE GASES		
2. Facility Address	4550 KENNEDY AVENUE		
3. Person Contacted / Title	ROB GARD 219-391-5147 LEAD TECHNICIAN		
4. No. of Employees	WORK 5 DAYS AND SOME WEEKENDS		
5. Shift Starting Time	Shift 1: 7-3 pm	Shift 2: 3-11 pm	Shift 3: 11-7 am
6. Inspection Type	Unannounced:	Scheduled: X	
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	No: X	
b) Complaint	Yes:	No: X	
c) Spill	Yes:	No:	
d) Violation	Yes:	No:	
e) Other	Yes: X	No:	
7. Explain Reason for Inspection: ANNUAL INSPECTION			
8. SPCC Plan Required and/or Slug Control Plan?	Yes SPCC X	No SLUG REQUIRED	
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes	No	
b) Is Plan Adequate?	Yes	No	
9. Explain Deficiencies in SPCC or Slug Control Plan?: <div style="text-align: center; font-size: 2em;">?</div>			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 19 / 19

B. PRE-TREATMENT PERMIT		
1. Permit No. <u>541</u>	2. Expiration Date: <u>?</u>	
3. Categorical Standard(s)	<u>NO</u> <input checked="" type="checkbox"/>	
4. Toxic Organic (Solvent) Management Plan Required	YES:	NO: <input checked="" type="checkbox"/>
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO: <input checked="" type="checkbox"/>
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or proposed changes to the IU? <div style="text-align: center; font-size: 2em;">?</div>		
7. Do Permit Limits Represent Current Operations?	YES: <input checked="" type="checkbox"/>	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES:	NO: <input checked="" type="checkbox"/>
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES:	NO:
b) Are Reports Current?	YES:	NO:
c) Are Reports Complete?	YES:	NO:
9. Explain Deficiencies in Self-Monitoring Reports:		
10. Schematic or site map provided?	YES: <input checked="" type="checkbox"/> <u>on file</u>	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 19 / 19

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City: X	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer	509,750		
b) Via NPDES Permit			
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process			
b) Contact Cooling			
a) Non-Contact Cooling			
b) Blow down			
a) Sanitary			
b) Other			
TOTAL		100%	
4. Process Discharge Flow:	Continuous X	Intermittent	Batch
If Batch	Gal/Batch	Frequency	
5. Type of Flow Measurement	6" PIPE METER SIZE, MAGNETROL - ECHOTEL III ULTRASONIC		
Adequate for Expected Flows?	YES:	NO:	
6. Date of Last Calibration:	4-22-19		
7. Number of Outfalls to POTW:			
8. Comments (Identify by Item No.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 19 / 19

D. Manufacturing Area			
1. Product(s) or Service(s) and General Description of Processes: CRYOGENIC DISTILLATION SPECIALTY GAS RARE AND CALIBRATING XENON, KRYPTON, AND NEON GASES. NEON PACKAGING HELIUM GLYCOL.			
2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
1) 3 COMPRESSORS	COOLING	X	
2) SMALL NON-PASS COOLING WATER			
SELF-CONTAINED			
3. Are there floor drains in the manufacturing areas?	YES: X	NO:	
4. Do the floor drains lead directly to the POTW?	YES:	NO: X	
5. Are temporary hoses in place as part of production?	YES:	NO: X	
6. Process areas Inspected:	LABS, MANUFACTURING OF GAS, STORAGE AND MONITORING SAMPLING AREAS		
7. Conditions / Operation	Good X	Fair	Poor
8. General Housekeeping:	Good VERY CLEAN X	Fair	Poor
9. Conditions: ALL ENERGY EFFICIENT AUTOMATIC LIGHTS THROUGHOUT THE FACILITY IN THE BUILDINGS. VERY CLEAN IN ALL THE BUILDINGS			
10. SPCC Practices Adequate?	YES:	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 19 / 19

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) *attach additional sheets if necessary*

Chemical Substance Inventory provided?				YES:		NO:
Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes
CLEAN HARBORS	NO	NO		0		LIGHT BULBS
↓	NO	NO		0		BATTERIES
↓	NO	NO		0		TITANIUM FLUORIDE
↓	NO	NO		0		WASTE OIL

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 19 / 19

F. Pre-Treatment Area				
1. Pretreatment System On-Site		YES:	NO: X	
2. Schematic or site map provided?		YES:	NO:	
3. Description: 				
4. Discharge	Continuous	Intermittent	Batch	Other
5. Conditions / Operation		Good	Fair	Poor
6. Comments (Reference any Deficiencies by item no.): 				
7. Certified Operator(s)		Licensed No.		Class
8. SPCC Practices Adequate?		Yes:		No:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 19 / 19

G. Chemical / Waste Storage Areas			
1. Sludge/Hazardous or Non-Hazardous Waste:		a) LIGHT BOLBS	
		b) BATTERIES	
		c) TITANIUM FLUORIDE	
2. Source of Waste	a) THROUGHOUT THE FACILITY		
	b) ↓		
	c) FROM PROCESS WASTE		
3. Describe any Waste Handling (What happens to it?)			
4. Quantity			
5. Transport Company		N/A	
6. Disposal Facility		N/A	
7. On-Site Storage		Yes: X	No:
8. Describe (Include any Irregularities in Drums, Labels, or Manifests):			
NO PROBLEMS OR IRREGULARITIES TO REPORT			
9. Conditions:		Good	Fair
		Poor	
10. Floor Drains in Storage Areas?		Yes:	No:
11. Are SPCC Practices Adequate?		Yes: X	No:
12. Comments (Reference any Deficiencies by item no.):			
GAS PRODUCTS KRYPTON AN			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 19 / 19

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES:	NO: <input checked="" type="checkbox"/>
2. Sample Collections Method:		
3. Is sampling location appropriate?		
4. IU and POTW sample at same location?	YES:	NO:
5. Chain-of-Custody Adequate?	YES:	NO:
6. Sampling Equipment Adequate:	YES:	NO:
7. Sample type appropriate?	YES:	NO:
8. Sample containers Appropriate?	YES:	NO:
9. Samples Properly Preserved?	YES:	NO:
10. Holding times Short Enough?	YES:	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES:	NO:
12. Is sampling frequency correct?	YES:	NO:
13. IU certifying reports sent to POTW and IDEM?	YES:	NO:
14. Sampling SOP reviewed?	YES:	NO:
15. Sampling QA/QC documents reviewed?	YES:	NO:
16. Analysis conducted	In-House	Contract Lab (Name)
17. Self-Monitoring Records	YES:	NO:
18. All Analytical results on File?	YES:	NO:
19. Records Kept for Period Specified in Permit?	YES:	NO:
20. Comments (Reference any Deficiencies by item no.):		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 19 / 19

I. Final Comments

1. Questions/ Comments/ Discussion

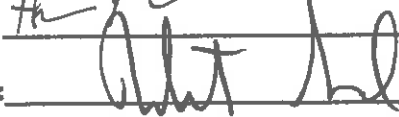
2. Follow Up Actions Required

Inspector(s) Signature(s):



Date: 11-19-19

IU Representative Signature:



Date: 11-19-19

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 14 / 2019

INSPECTOR: Nickie Geros and Henry Padilla

STARTING TIME: 12:30 PM **ENDING TIME:** 1:30 PM

A. BACKGROUND INFORMATION			
1. Facility Name	Safety-Kleen Systems, Inc.		
2. Facility Address	601 Riley Road, East Chicago, IN 46312		
3. Person Contacted / Title	Michael Radcliffe/Sr. Mgr. Environmental Compliance		
4. No. of Employees			
5. Shift Starting Time	Shift 1: 06:00	Shift 2: 18:00	Shift 3:
6. Inspection Type	Unannounced:	Scheduled: Yes	
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	No:	
b) Complaint	Yes:	No:	
c) Spill	Yes:	No:	
d) Violation	Yes:	No:	
e) Other	Yes:	No:	
7. Explain Reason for Inspection: Annual inspection 2019			
8. SPCC Plan Required and/or Slug Control Plan?	Yes Both are required		No
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes On file		No
b) Is Plan Adequate?	Yes Yes		No
9. Explain Deficiencies in SPCC or Slug Control Plan?: None			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11 / 14 / 2019

B. PRE-TREATMENT PERMIT		
1. Permit No. 901	2. Expiration Date: August 21, 2023	
3. Categorical Standard(s)	Yes	
4. Toxic Organic (Solvent) Management Plan Required	YES:	NO: No
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO:
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU? No		
7. Do Permit Limits Represent Current Operations?	YES: Yes	NO:
If not, what changes are necessary? Negotiating a higher available cyanide discharge limit		
8. Are Self-Monitoring Reports Required?	YES: X	NO:
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES: X	NO:
b) Are Reports Current?	YES: X	NO:
c) Are Reports Complete?	YES: X	NO:
9. Explain Deficiencies in Self-Monitoring Reports: None		
10. Schematic or site map provided?	YES: X	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 14 / 2019

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City: X	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer	4,461,280	100%	
b) Via NPDES Permit	0		
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process		94.7%	
b) Contact Cooling		0%	
a) Non-Contact Cooling		0.5%	
b) Blow down		0%	
a) Sanitary		0.8%	
b) Other		0%	
TOTAL		100%	
4. Process Discharge Flow:	Continuous Yes	Intermittent	Batch
If Batch	Gal/Batch	Frequency	
5. Type of Flow Measurement			
Adequate for Expected Flows?	YES: X	NO:	
6. Date of Last Calibration:	April 2019		
7. Number of Outfalls to POTW:	One for sanitary and one for pretreatment works		
8. Comments (Identify by Item No.):			
ECSD permit only covers discharge from pretreatment works			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 14 / 2019

D. Manufacturing Area

1. Product(s) or Service(s) and General Description of Processes:

Re-refining and reformulation of used oils to produce recycled oils for commercial and industrial use. Washing of truck trailers and rail cars with commercial soaps and water. Pretreatment of wastewaters using biological and physical/chemical treatment methods.

2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
Refining wastewater	Oily process water		On-site WWTP
Truck Trailer wash	Soapy and oil water		On Site WWTP
Rail car wash	Soapy and oily water		On site WWTP
Stormwater from containment	Precipitation possible oils		On-site WWTP
WWTP Discharge	Pretreated process wastewaters	Yes	
3. Are there floor drains in the manufacturing areas?	YES: X - containment areas only	NO:	
4. Do the floor drains lead directly to the POTW?	YES:	NO: X	
5. Are temporary hoses in place as part of production?	YES:	NO: X	
6. Process areas Inspected:			
7. Conditions / Operation	Good X	Fair	Poor
8. General Housekeeping:	Good X	Fair	Poor
9. Conditions: Clean and neat All floor drains got to on-site WWTP			
10. SPCC Practices Adequate?	YES: X	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 14 / 2019

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) <i>attach additional sheets if necessary</i>						
Chemical Substance Inventory provided?				YES: <input checked="" type="checkbox"/>		NO: <input type="checkbox"/>
Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes
						see attached list

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 14 / 2019

F. Pre-Treatment Area				
1. Pretreatment System On-Site		YES: <input checked="" type="checkbox"/>	NO:	
2. Schematic or site map provided?		YES: <input checked="" type="checkbox"/>	NO:	
3. Description:				
4. Discharge	Continuous <input checked="" type="checkbox"/>	Intermittent	Batch	Other
5. Conditions / Operation		Good <input checked="" type="checkbox"/>	Fair	Poor
6. Comments (Reference any Deficiencies by item no.):				
7. Certified Operator(s)	Licensed No.		Class	
8. SPCC Practices Adequate?	Yes: <input checked="" type="checkbox"/>		No:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 14 / 2019

G. Chemical / Waste Storage Areas			
1. Sludge/Hazardous or Non-Hazardous Waste:		a) Laboratory testing waste - Haz	
		b) Used oil - Non-hazardous	
		c) Wastewater treatment sludge	
2. Source of Waste		a) On site analytical laboratory	
		b) Process wastes from re-refining operations	
		c) Basic biological and physical treatments	
3. Describe any Waste Handling (What happens to it?)		Wastes from a are drummed and sent off-site for incineration (lab only), wastes from b are reused (waste caustic) and wastes from c are landfilled as non-hazardous wastes.	
4. Quantity		Varies with time and waste type	
5. Transport Company		Varies with waste stream	
6. Disposal Facility		Varies with waste type.	
7. On-Site Storage		Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
8. Describe (Include any Irregularities in Drums, Labels, or Manifests): None			
9. Conditions:		Good <input checked="" type="checkbox"/>	Fair <input type="checkbox"/> Poor <input type="checkbox"/>
10. Floor Drains in Storage Areas?		Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
11. Are SPCC Practices Adequate?		Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
12. Comments (Reference any Deficiencies by item no.): None			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 11 / 14 / 2019

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES: X	NO:
2. Sample Collections Method: Grab and flow proportional methods are used as required by ECSD permit		
3. Is sampling location appropriate?	YES	
4. IU and POTW sample at same location?	YES:	NO: X
5. Chain-of-Custody Adequate?	YES: X	NO:
6. Sampling Equipment Adequate:	YES: X	NO:
7. Sample type appropriate?	YES: X	NO:
8. Sample containers Appropriate?	YES: X	NO:
9. Samples Properly Preserved?	YES: X	NO:
10. Holding times Short Enough?	YES: X	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES: X	NO:
12. Is sampling frequency correct?	YES: X	NO:
13. IU certifying reports sent to POTW and IDEM?	YES: X	NO:
14. Sampling SOP reviewed?	YES: X	NO:
15. Sampling QA/QC documents reviewed?	YES: X	NO:
16. Analysis conducted	In-House	Contract Lab (Name) ALS
17. Self-Monitoring Records	YES: X	NO:
18. All Analytical results on File?	YES: X	NO:
19. Records Kept for Period Specified in Permit?	YES: X	NO:
20. Comments (Reference any Deficiencies by item no.): None		

EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT

Inspection Date: 11 / 14 / 2019

I. Final Comments

1. Questions/ Comments/ Discussion Good housekeeping

2. Follow Up Actions Required None

Inspector(s) Signature(s): _____ Date: _____

IU Representative Signature: _____ Date: 11/14/2019

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 11, 8, 19

INSPECTOR: #936 N.G. & H.P.

STARTING TIME: 11:10 ENDING TIME: 11:50 A.M.

A. BACKGROUND INFORMATION <u>#936-</u>			
1. Facility Name			
2. Facility Address			
3. Person Contacted / Title			
4. No. of Employees			
5. Shift Starting Time	Shift 1:	Shift 2:	Shift 3:
6. Inspection Type	Unannounced:		Scheduled:
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	No:	
b) Complaint	Yes:	No:	
c) Spill	Yes:	No:	
d) Violation	Yes:	No:	
e) Other	Yes:	No:	
7. Explain Reason for Inspection:			
8. SPCC Plan Required and/or Slug Control Plan?	Yes		No
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes		No
b) Is Plan Adequate?	Yes		No
9. Explain Deficiencies in SPCC or Slug Control Plan?:			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: ____/____/____

B. PRE-TREATMENT PERMIT		
1. Permit No.	2. Expiration Date:	
3. Categorical Standard(s)		
4. Toxic Organic (Solvent) Management Plan Required	YES:	NO:
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO:
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU?		
7. Do Permit Limits Represent Current Operations?	YES:	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES:	NO:
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES:	NO:
b) Are Reports Current?	YES:	NO:
c) Are Reports Complete?	YES:	NO:
9. Explain Deficiencies in Self-Monitoring Reports:		
10. Schematic or site map provided?	YES:	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ____/____/____

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City:	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer			
b) Via NPDES Permit			
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process			
b) Contact Cooling			
a) Non-Contact Cooling			
b) Blow down			
a) Sanitary			
b) Other			
TOTAL		100%	
4. Process Discharge Flow:	Continuous	Intermittent	Batch
If Batch	Gal/Batch	Frequency	
5. Type of Flow Measurement			
Adequate for Expected Flows?	YES:	NO:	
6. Date of Last Calibration:			
7. Number of Outfalls to POTW:			
8. Comments (Identify by Item No.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ____/____/____

D. Manufacturing Area			
1. Product(s) or Service(s) and General Description of Processes:			
2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
3. Are there floor drains in the manufacturing areas?	YES:	NO:	
4. Do the floor drains lead directly to the POTW?	YES:	NO:	
5. Are temporary hoses in place as part of production?	YES:	NO:	
6. Process areas Inspected:			
7. Conditions / Operation	Good	Fair	Poor
8. General Housekeeping:	Good	Fair	Poor
9. Conditions:			
10. SPCC Practices Adequate?	YES:	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ___/___/___

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) *attach additional sheets if necessary*

Chemical Substance Inventory provided?				YES:		NO:
Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes

EAST CHICAGO SANITARY DISTRICT INDUSTRIAL PRETREATMENT INSPECTION REPORT

Inspection Date: / /

F. Pre-Treatment Area					
1. Pretreatment System On-Site		YES:	NO:		
2. Schematic or site map provided?		YES:	NO:		
3. Description:					
4. Discharge	Continuous	Intermittent	Batch	Other	
5. Conditions / Operation		Good	Fair	Poor	
6. Comments (Reference any Deficiencies by item no.):					
7. Certified Operator(s)		Licensed No.	Class		
8. SPCC Practices Adequate?		Yes:	No:		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ____/____/____

G. Chemical / Waste Storage Areas			
1. Sludge/Hazardous or Non-Hazardous Waste:		a)	
		b)	
		c)	
2. Source of Waste		a)	
		b)	
		c)	
3. Describe any Waste Handling (What happens to it?)			
4. Quantity			
5. Transport Company			
6. Disposal Facility			
7. On-Site Storage		Yes:	No:
8. Describe (Include any Irregularities in Drums, Labels, or Manifests):			
9. Conditions:	Good	Fair	Poor
10. Floor Drains in Storage Areas?	Yes:		No:
11. Are SPCC Practices Adequate?	Yes:		No:
12. Comments (Reference any Deficiencies by item no.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ____/____/____

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES:	NO:
2. Sample Collections Method:		
3. Is sampling location appropriate?		
4. IU and POTW sample at same location?	YES:	NO:
5. Chain-of-Custody Adequate?	YES:	NO:
6. Sampling Equipment Adequate:	YES:	NO:
7. Sample type appropriate?	YES:	NO:
8. Sample containers Appropriate?	YES:	NO:
9. Samples Properly Preserved?	YES:	NO:
10. Holding times Short Enough?	YES:	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES:	NO:
12. Is sampling frequency correct?	YES:	NO:
13. IU certifying reports sent to POTW and IDEM?	YES:	NO:
14. Sampling SOP reviewed?	YES:	NO:
15. Sampling QA/QC documents reviewed?	YES:	NO:
16. Analysis conducted	In-House	Contract Lab (Name)
17. Self-Monitoring Records	YES:	NO:
18. All Analytical results on File?	YES:	NO:
19. Records Kept for Period Specified in Permit?	YES:	NO:
20. Comments (Reference any Deficiencies by item no.):		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ____/____/____

I. Final Comments

1. Questions/ Comments/ Discussion

2. Follow Up Actions Required

Inspector(s) Signature(s): _____ **Date:** _____

IU Representative Signature: _____ **Date:** _____

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 12/9/19

INSPECTOR: Henry Padilla

STARTING TIME: 1000 A.m. ENDING TIME: 1100 A.m.

0

A. BACKGROUND INFORMATION #941			
1. Facility Name	<u>Praxair Inc</u>		
2. Facility Address	<u>25551 Mickey Rd</u>		
3. Person Contacted / Title	<u>David Moore, Paul Piper, Joe Centami</u>		
4. No. of Employees	<u>~25</u>		
5. Shift Starting Time	Shift 1: <u>5am</u>	Shift 2: <u>5pm</u>	Shift 3:
6. Inspection Type	Unannounced:	Scheduled: <input checked="" type="checkbox"/>	
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	<u>No:</u>	
b) Complaint	Yes:	<u>No:</u>	
c) Spill	Yes:	<u>No:</u>	
d) Violation	Yes:	<u>No:</u>	
e) Other	<u>Yes:</u>	<u>No:</u>	
7. Explain Reason for Inspection: <u>Routine Annual</u>			
8. SPCC Plan Required and/or Slug Control Plan?	<u>Yes</u>	No <u>SPCC - will be updated in 2020</u>	
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	<u>Yes</u>	No	
b) Is Plan Adequate?	<u>Yes</u>	No	
9. Explain Deficiencies in SPCC or Slug Control Plan?:			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 12/9/19

B. PRE-TREATMENT PERMIT		
1. Permit No. <u>outfall # 941</u>	2. Expiration Date:	
3. Categorical Standard(s)		
4. Toxic Organic (Solvent) Management Plan Required	YES:	<u>NO:</u>
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO:
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU?		
7. Do Permit Limits Represent Current Operations?	<u>YES:</u>	NO:
If not, what changes are necessary? <u>N/A</u>		
8. Are Self-Monitoring Reports Required?	YES:	<u>NO:</u>
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES:	NO:
b) Are Reports Current?	YES:	NO:
c) Are Reports Complete?	YES:	NO:
9. Explain Deficiencies in Self-Monitoring Reports:		
10. Schematic or site map provided?	YES: <u>X</u> <u>SPCC Plan</u> <u>has as well as SUPP</u>	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/9/17

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City: <input checked="" type="checkbox"/>	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer	<input checked="" type="checkbox"/>		
b) Via NPDES Permit		<input checked="" type="checkbox"/>	
c) Into Product		<input checked="" type="checkbox"/>	
d) Evaporation		<input checked="" type="checkbox"/>	
e) Other		<input checked="" type="checkbox"/>	
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process - H ₂ Production boiler blow down			
b) Contact Cooling - H ₂ Production cooling tower			
a) Non-Contact Cooling - CO ₂ production cooling water			
b) Blow down - CO ₂ production boiler			
a) Sanitary			
b) Other - ww assoc. w/ maint. activities			
TOTAL	900,000	100%	
4. Process Discharge Flow:	Continuous <input checked="" type="checkbox"/>	Intermittent	Batch
If Batch	Gal/Batch	Frequency	
5. Type of Flow Measurement	Flow meter		
Adequate for Expected Flows?	YES: <input checked="" type="checkbox"/>	NO:	
6. Date of Last Calibration:	11-11-19		
7. Number of Outfalls to POTW:	1		
8. Comments (Identify by Item No.): N/A			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date:

12 / 9 / 19

D. Manufacturing Area

1. Product(s) or Service(s) and General Description of Processes:

Industrial Gas Manufacturing - specifically H_2 + CO_2

2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
3. Are there floor drains in the manufacturing areas?	YES:	NO: <input checked="" type="checkbox"/>	
4. Do the floor drains lead directly to the POTW?	YES:	NO: <input checked="" type="checkbox"/>	
5. Are temporary hoses in place as part of production?	YES:	NO: <input checked="" type="checkbox"/>	
6. Process areas Inspected:			
7. Conditions / Operation	Good <input checked="" type="checkbox"/>	Fair	Poor
8. General Housekeeping:	Good <input checked="" type="checkbox"/>	Fair	Poor
9. Conditions:			
10. SPCC Practices Adequate?	YES: <input checked="" type="checkbox"/>	NO:	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12 / 9 / 19

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) attach additional sheets if necessary

Chemical Substance Inventory provided?

YES:

NO:

Name	Liquid?	Contained?	Size container	Quantity	MSDS?	Notes
see		SPCC				

in SPCC

12 / 9 / 17

6

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12 / 9 / 17

G. Chemical / Waste Storage Areas			
1. Sludge/Hazardous or Non-Hazardous Waste:		a)	
		b)	
		c)	
2. Source of Waste		a) universal wastes	
		b) used oil	
		c)	
3. Describe any Waste Handling (What happens to it?)		sent offsite to permitted & appropriate disposal/recycling location	
4. Quantity		USQG	
5. Transport Company		Safe-Kleen	
6. Disposal Facility		Union	
7. On-Site Storage		Yes:	No: X
8. Describe (Include any Irregularities in Drums, Labels, or Manifests):			
9. Conditions:		X Good	Fair Poor
10. Floor Drains in Storage Areas?		Yes:	No: X
11. Are SPCC Practices Adequate?		Yes: X	No:
12. Comments (Reference any Deficiencies by item no.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date:

12 / 9 / 17

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES:	NO: <input checked="" type="checkbox"/>
2. Sample Collections Method: <u>city collects sample</u>		
3. Is sampling location appropriate?		
4. IU and POTW sample at same location?	YES:	NO:
5. Chain-of-Custody Adequate?	YES:	NO:
6. Sampling Equipment Adequate:	YES:	NO:
7. Sample type appropriate?	YES:	NO:
8. Sample containers Appropriate?	YES:	NO:
9. Samples Properly Preserved?	YES:	NO:
10. Holding times Short Enough?	YES:	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES:	NO:
12. Is sampling frequency correct?	YES:	NO:
13. IU certifying reports sent to POTW and IDEM?	YES:	NO:
14. Sampling SOP reviewed?	YES:	NO:
15. Sampling QA/QC documents reviewed?	YES:	NO:
16. Analysis conducted	In-House	Contract Lab (Name)
17. Self-Monitoring Records	YES:	NO:
18. All Analytical results on File?	YES:	NO:
19. Records Kept for Period Specified in Permit?	YES:	NO:
20. Comments (Reference any Deficiencies by item no.):		

EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT

Inspection Date: 12/19/19

I. Final Comments

1. Questions/ Comments/ Discussion

2. Follow Up Actions Required

Inspector(s) Signature(s): [Signature] Date: 12-09-19

IU Representative Signature: [Signature] Date: 12-9-19

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 12/13/19

INSPECTOR: Henry Padilla

STARTING TIME: 9:45 AM **ENDING TIME:** 10:35AM

A. BACKGROUND INFORMATION			
1. Facility Name	United States Gypsum		
2. Facility Address	301 Riley Road East Chicago, IN 46312		
3. Person Contacted / Title	Kevin Henry Engineering General Foreman		
4. No. of Employees	135		
5. Shift Starting Time	Shift 1: 6am to 6pm	Shift 2: 6pm to 6am	Shift 3: NA
6. Inspection Type	Unannounced: No		Scheduled: Yes
IF UNANNOUNCED, COMPLETE ITEMS BELOW, OTHERWISE GO TO ITEM No. 8.			
a) New Company	Yes:	No:	
b) Complaint	Yes:	No:	
c) Spill	Yes:	No:	
d) Violation	Yes:	No:	
e) Other	Yes:	No:	
7. Explain Reason for Inspection:			
8. SPCC Plan Required and/or Slug Control Plan?	Yes		No
IF REQUIRED PROCEED, OTHERWISE GO TO PAGE 2, PRETREATMENT PERMIT.			
a) Is Plan on File?	Yes X	No	
b) Is Plan Adequate?	Yes X	No	
9. Explain Deficiencies in SPCC or Slug Control Plan?:			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

INSPECTION DATE: 12/13/19

B. PRE-TREATMENT PERMIT		
1. Permit No. No pre-treatment permit required	2. Expiration Date: NA	
3. Categorical Standard(s)		
4. Toxic Organic (Solvent) Management Plan Required	YES:	NO:
If required, Proceed, Otherwise go to Item No. 6.		
a) Is Plan on File?	YES:	NO:
b) Is Plan Adequate?	YES:	NO:
5. Production Based Standard Applicable?	YES:	NO:
If So, current Average Production Rate(s)		
6. Are there any changes since last inspection or planned changes to the IU?		
7. Do Permit Limits Represent Current Operations?	YES:	NO:
If not, what changes are necessary?		
8. Are Self-Monitoring Reports Required?	YES:	NO:
If required proceed, otherwise go to page 3 Part C. Water/Wastewater.		
a) Are Reports on File?	YES:	NO:
b) Are Reports Current?	YES:	NO:
c) Are Reports Complete?	YES:	NO:
9. Explain Deficiencies in Self-Monitoring Reports:		
10. Schematic or site map provided?	YES:	NO:

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/13/19

C. WATER/WASTEWATER			
1. Source of Intake Water (GPD):	City: X	Well:	Other:
2. Discharge Method:	Volume (GPD) Month	Percent of Total	
a) Into Sewer	869,143 GPM average in 2019		
b) Via NPDES Permit			
c) Into Product			
d) Evaporation			
e) Other			
3. Discharge(s) to Sewer	Volume (GPD) Month	Percent of Total	
a) Industrial Process			
b) Contact Cooling			
a) Non-Contact Cooling			
b) Blow down			
a) Sanitary	X		
b) Other	X wash down water		
TOTAL		100%	
4. Process Discharge Flow:	Continuous	Intermittent	Batch
If Batch	Gal/Batch	Frequency	
5. Type of Flow Measurement	Palmer Bowlus Flume meter		
Adequate for Expected Flows?	YES: X		NO:
6. Date of Last Calibration:	9/10/19		
7. Number of Outfalls to POTW:	2		
8. Comments (Identify by Item No.):			
We have a 4" sewer line and meter for the main office and employee locker room.			
We have an 8" sewer line for the factory and all the restroom and sinks			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/13/19

D. Manufacturing Area			
1. Product(s) or Service(s) and General Description of Processes: We manufacture Sheet Rock dry wall panels in the Board plant and Ready Mix wet and dry compounds on the Joint Treatment plant.			
2. Process Waste stream(s)	Description	To Sewer	To other (Specify)
Sanitary	Sinks and toilets	Yes	
Equipment wash down water	Wash down water from starting and stopping the line. Most of the waste water is fed into the board making process. We only pump to the sewer only if our waste water tanks are full.	Yes	
3. Are there floor drains in the manufacturing areas?	YES: One drain in the Ready Mix area	NO: All wash down water in Board is pumped to the waste water tank	
4. Do the floor drains lead directly to the POTW?	YES:	NO: X	
5. Are temporary hoses in place as part of production?	YES:	NO: X	
6. Process areas Inspected:	Yes		
7. Conditions / Operation	Good	Fair	Poor
8. General Housekeeping:	Good	Fair	Poor
9. Conditions:			

10. SPCC Practices Adequate?			YES:	NO:
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**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: 12/13/19

E. Materials Used (list any raw materials, solvents, oils, chemicals, pretreatment, and boiler/cooling tower additives) *attach additional sheets if necessary*

Chemical Substance Inventory provided?				YES:		NO:
Name	Liquid ?	Contained?	Size container	Quantity	MSDS?	Notes
Hyonic PFM-33 (soap)	Yes	Yes	330 gallon tote	6 totes	Yes	
Hyonic PFM-25 (soap)	Yes	Yes	330 gallon tote	6 totes	Yes	
DTPA NA5 (retarder)	Yes	Yes	330 gallon totes	4 totes	Yes	
Carbohydrae Adhesive # 09199-5R6-JB	Yes	Yes	330 gallon tote	6 totes	Yes	

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: ____/____/____

G. Chemical / Waste Storage Areas			
1. Sludge/Hazardous or Non-Hazardous Waste:		a)	
		b)	
		c)	
2. Source of Waste	a)		
	b)		
	c)		
3. Describe any Waste Handling (What happens to it?)			
4. Quantity			
5. Transport Company			
6. Disposal Facility			
7. On-Site Storage		Yes:	No:
8. Describe (Include any Irregularities in Drums, Labels, or Manifests):			
9. Conditions:		Good	Fair
			Poor
10. Floor Drains in Storage Areas?		Yes:	No:
11. Are SPCC Practices Adequate?		Yes:	No:
12. Comments (Reference any Deficiencies by item no.):			

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**

Inspection Date: **12/13/19**

H. Industrial Self-Monitoring		
1. Is Self-Monitoring Required?	YES:	NO:
2. Sample Collections Method:		
3. Is sampling location appropriate?		
4. IU and POTW sample at same location?	YES:	NO:
5. Chain-of-Custody Adequate?	YES:	NO:
6. Sampling Equipment Adequate:	YES:	NO:
7. Sample type appropriate?	YES:	NO:
8. Sample containers Appropriate?	YES:	NO:
9. Samples Properly Preserved?	YES:	NO:
10. Holding times Short Enough?	YES:	NO:
11. Sampling/ analysis done in accordance with 40 CFR 136?	YES:	NO:
12. Is sampling frequency correct?	YES:	NO:
13. IU certifying reports sent to POTW and IDEM?	YES:	NO:
14. Sampling SOP reviewed?	YES:	NO:
15. Sampling QA/QC documents reviewed?	YES:	NO:
16. Analysis conducted	In-House	Contract Lab (Name)
17. Self-Monitoring Records	YES:	NO:
18. All Analytical results on File?	YES:	NO:
19. Records Kept for Period Specified in Permit?	YES:	NO:
20. Comments (Reference any Deficiencies by item no.):		

**EAST CHICAGO SANITARY DISTRICT
INDUSTRIAL PRETREATMENT INSPECTION REPORT**


Inspection Date: ___/___/___

I. Final Comments

1. Questions/ Comments/ Discussion

2. Follow Up Actions Required

Inspector(s) Signature(s):  **Date:** 12-16-19

IU Representative Signature:  **Date:** 12-16-19

FORM ADAPTED FROM INDIANA PRETREATMENT GROUP INSPECTION FORM, NO. 0586B, DATED 03/90